

Bridging the Gap Between Energy Poverty and Energy Renovation

Developing Residential
Retrofitting as a Tool to
Combat Energy Poverty

MARCH 2024





Acknowledgments

We would like to thank all the organisations who helped in developing these recommendations, either through one-to-one interviews, or their contributions to workshops and focus group meetings. These organisations are listed on p.26-27 of the report.

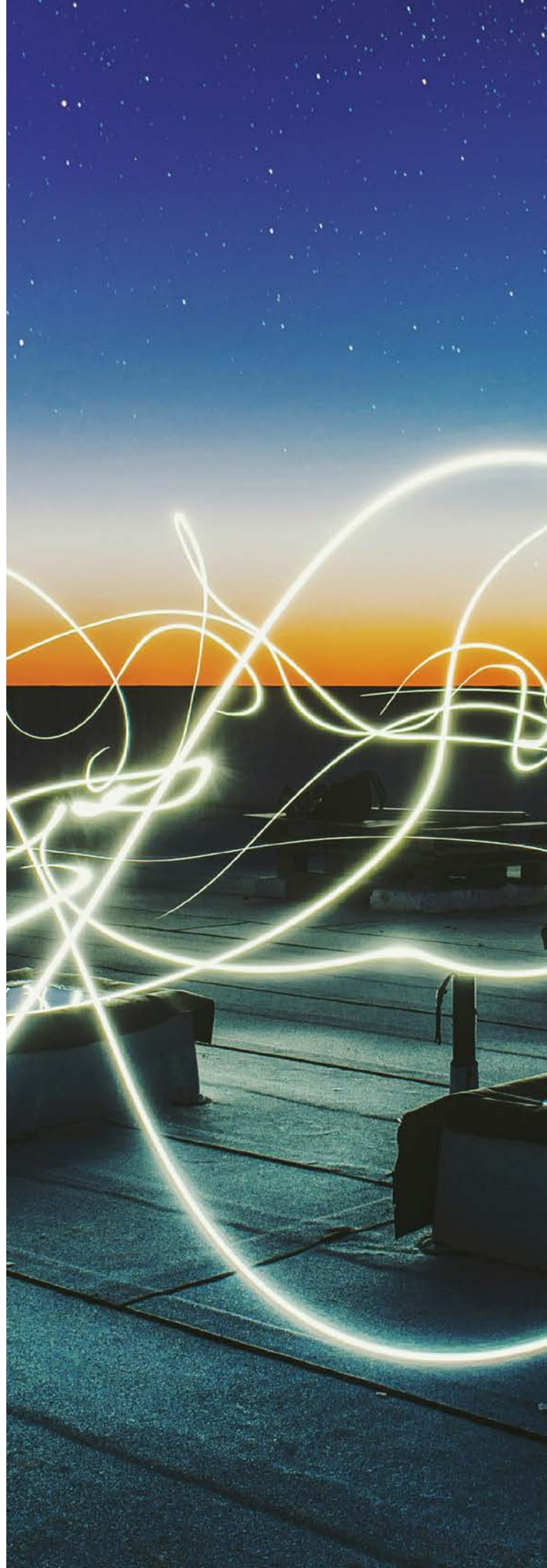
About this Initiative

This report was commissioned by Friends of the Earth Ireland, as part of a programme coordinated by Ms Clare O'Connor and Mr Jerry Mac Evilly, with funding from the European Climate Foundation.

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EXECUTIVE SUMMARY

Increases in investment in residential retrofits in recent years have led to a significant reduction in carbon emissions associated with this sector. Yet almost a third of Irish households were at risk of energy poverty in 2022. Living in energy poverty is associated with negative physical and mental health outcomes, including respiratory and cardiovascular diseases, as well as arthritis and rheumatism. This report makes a series of policy recommendations to Government on how to better address energy poverty in Ireland through ambitious and targeted energy renovation programmes.

Developing the recommendations that are outlined in this report involved extensive desk research, complemented by in-depth stakeholder engagement. Desk research was first used to explore existing literature, review existing schemes and policies, as well as international best practices. The review was also complemented by one-to-one interviews with key stakeholders and a workshop was organised in October 2023. These steps allowed the research team to gain a more comprehensive understanding of the issues and to generate a list of ideas to be explored in order to ensure Ireland's retrofit programme fully delivers for those experiencing energy poverty. Subsequently, six more in-depth focus group meetings were held with key stakeholders to test the ideas generated and gather nuanced feedback. The recommendations presented in this report are based on this collective input – Please see the Methodology section for further details.

“ “ This report makes a series of policy recommendations to Government on how to better address energy poverty in Ireland through ambitious and targeted energy renovation programmes ” ”

Summary of Key Recommendations



Develop & Implement a Comprehensive Approach to Tackle Energy Poverty

Review and update the SEAI's overall mandate to include a greater focus on supporting those most at risk of energy poverty and facilitate more holistic renovations.
- See recommendation 1.

Complete a full review of Ireland's National Retrofit Strategy (including targets) on a regular basis to ensure it supports the most vulnerable in society and delivers real emissions savings.
- See recommendation 4.



Facilitate Energy Renovation For All

Set up an extensive network of independent energy renovation advisors and task them to work with communities, anti-poverty groups, etc. to better identify and target vulnerable households on the ground, coordinate support through the renovation journey and support project aggregation¹.
- See recommendations 12 and 13.

Train relevant professionals to recognise energy poverty and identify those most at risk. Social workers, healthcare professionals, as well as liaison officers in (e.g.) schools, libraries and churches should be made aware of energy poverty, how to recognise it, as well as the benefits of energy renovation and support available.
(Continued on next page)



Make Energy Renovation More Affordable For All

Review the criteria of the SEAI Free Energy Upgrade Programme on a regular basis to ensure it provides additionality and that the most vulnerable groups in society have access to it.
- See recommendation 17.

Further prioritise homes as part of the free upgrade scheme using GIS mapping (recommendation 5) and the network of renovation advisors (recommendations 12 and 13). Interim actions such as streamlining the process through greater aggregation and further prioritising households based on annual income (e.g. based on the P60 form) should be considered to address the long waiting list².
(Continued on next page)



Invest in Energy Renovation of Social Housing

Set up a multi-annual strategy (e.g. 10 years) for the retrofit of local authorities' social housing stock so that all local authorities have greater clarity on targets and budget allocation for the next decade and can adequately prepare for same.
- See recommendation 27.

Improve funding for the energy renovation of the AHBs' stock. This could be achieved either by increasing funding to match the level of funding made available to local authorities under the Energy Efficiency Retrofitting Programme (EERP) scheme or by further supporting the development of alternative financial mechanisms - e.g. zero or low interest loans.
- See recommendation 28.

¹ Pilot initiatives may be initially required to ensure appropriate implementation, but suggestions put forward as part of this research is that these advisors may be based in local energy agencies (where available), or Citizens Information Offices and libraries and employed by SEAI – e.g. perhaps as part of a SEC Mentor + programme.

² The current waiting list for the Free Energy Upgrade Programme is approximately 20 months.

Summary of Key Recommendations *continued*

	<p>Their role should be to signpost vulnerable households to energy renovation advisors/ places where they can get information on schemes available.</p> <p>- See recommendation 14.</p>	<p>- See recommendations 18 and 19.</p>	<p>- See recommendation 28.</p>
<p>Mandate the development of high-quality GIS maps at local authority level to identify areas at risk of energy poverty and actively prioritise these areas as part of all energy renovation programmes and for project aggregation.</p> <p>- See recommendation 5.</p>	<p>Provide better and more accessible information on energy renovation to households most at risk of energy poverty, taking account of differences in literacy, digital literacy, etc.</p> <p>- See recommendation 15.</p>	<p>Review funding mechanisms to address energy poverty on a regular basis to ensure renewable technologies and innovative technologies that support carbon and financial savings are eligible.</p> <p>- See recommendations 20 and 21.</p>	<p>Require social housing providers to further prioritise the worst performing part of the stock – where practical. E.g. through a prioritisation of homes with a pre-works BER rating of E, F and G, and a year of construction pre-1993, as is already done under the Warmer Homes Scheme.</p> <p>- See recommendation 29.</p>
<p>Ensure all programmes to address energy poverty are co-designed with vulnerable groups and anti-poverty organisations.</p> <p>- See recommendation 6</p>	<p>Train contractors and one-stop-shops on communications on energy renovation, including communications with most vulnerable groups in society to better support them through the renovation journey.</p> <p>- See recommendation 16.</p>	<p>Pilot and introduce new schemes to better support households falling just above the free energy upgrade threshold.</p> <p>In addition to free Renovation Passports for single measures (Recommendation 9), other actions such as introducing a sliding scale on the rate of grants based on income or an equity release scheme (for asset rich/ cash poor households) should be considered.</p> <p>- See recommendation 22.</p>	<p>Further support the installation of renewable technologies within the social housing stock. E.g. through an acceleration of the roll out of innovative approaches such as Energy Cloud (or similar models) to all social housing providers.</p> <p>- See recommendation 31.</p>
<p>Mandate and fully fund the development of Renovation Passports for shallow energy renovation works receiving public funding³ by 2026 to ensure they lead to high quality, deep retrofit over time.</p> <p>- See recommendation 9</p>			

³ SEAI grants and Energy Efficiency Retrofitting Programme (EERP) for social housing.

INTRODUCTION

About Energy Poverty in Ireland

Addressing energy poverty through energy renovation is key in tackling economic, social and health disparities whilst reaching Ireland's climate targets. Operational emissions from the residential sector account for 9.7% of Ireland's national emissions. Already, efforts to reduce these operational emissions, by both improving building efficiency and increasing the share of renewable energy, have begun to bear fruit. Residential emissions fell by 12.7% in 2022 (EPA, 2023), yet research published by the Economic and Social Research Institute (ESRI) estimate the potential for energy prices to increase by 25% could result in an increase in energy poverty to 40.3% (Barrett, 2022). To date, in Ireland, a household that spends more than 10% of its income on energy is considered to be in energy poverty as it is quantified using what is known as the expenditure method of measuring energy poverty (DCENR, 2016). Using the energy expenditure measure to analyse fuel poverty, it can be seen that energy poverty declined during the 1990s and early 2000s, before beginning to increase after 2008. With the inflation in energy price as a key contributor, it is estimated that there have been further increases of households at risk of energy poverty to 29.4% in 2022 - from 13.2% in 2015/2016 (Barrett, 2022).

The 2023 European Commission Recommendation on Energy Poverty (EU, 2023) states that energy poverty is a multi-dimensional phenomenon, driven primarily by three underlying root causes, linked to high energy expenditure in proportion to a household's budget, low levels of income, and low energy performance of buildings and appliances. The recently adopted revision of the Energy Efficiency Directive (European Commission, 23)

includes for the first time an EU-wide definition of energy poverty, noting that energy poverty means a "household's lack of access to essential energy services, where such services provide basic levels and decent standards of living and health, including adequate heating, hot water, cooling, lighting, and energy to power appliances, in the relevant national context, existing national social policy and other relevant national policies, caused by a combination of factors, including at least non-affordability, insufficient disposable income, high energy expenditure and poor energy efficiency of homes". Now that energy poverty is defined at the EU level, the EU's legal framework requires that energy poverty in Member States is identified and tackled at the National Energy and Climate Plans (NECPs) level, providing a timeframe, and outlining relevant policies.

Analysing the trends in energy poverty in Ireland helps to identify and target those that are most at risk of energy poverty. ESRI's Research indicates that households in border counties experience higher levels of energy poverty with semi-detached and detached dwellings being more likely to be energy poor compared to apartments. Younger people are also more exposed to it than the general population, and tenants are more likely to experience energy poverty compared to those that own their homes (ESRI, 2022). Single parents, ethnic minorities, disabled people, and older people also face a higher risk of suffering from energy poverty (Lawlor, 2022). Those that are more exposed to energy poverty often have less disposable income and struggle with existing inequalities making it difficult to afford energy upgrades. This is often due to socioeconomic disparities intersecting with various factors such as housing quality and ease of access to available resources. As the most vulnerable in society are often the most at risk of being in energy poverty, addressing this issue

through energy renovation is key in reaching Ireland's climate targets, and in protecting those on lower incomes as part of the low carbon transition.

Studies show that Ireland has high level of winter deaths with an obvious relationship between it and “the incidence of fuel poverty, social class, geographic and demographic patterns” (Lawlor, 2022). The physical and mental health consequences of energy poverty can have long lasting implications. Cold, damp, unventilated homes generate mould and dust-mites which can negatively affect a person's respiratory system and exacerbate conditions such as asthma and allergies (Lawlor, 2022). Research also indicates that “the energy poor population is statistically more likely to report poor health and emotional well-being than the non-energy poor population, with a higher incidence of bad and very bad self-reported health, poor emotional well-being, and likely depression” (Thomson, 2017).

Since energy prices are expected to remain high and volatile (Ambrose, 2023), long-term solutions are vital. Social policies, such as social tariffs or subsidies on electricity and gas, do not allow consumers to definitively emerge from their energy poverty situation, as they only alleviate the problem and do not affect the causes. Long term solutions including an increased investment in efforts to insulate the worst performing part of the housing stock must become a priority.

Retrofitting of energy poor homes has the potential to enhance living conditions while contributing to environmental sustainability and reduced greenhouse gas (GHG) emissions. It creates the opportunity to make homes more energy efficient whilst also promoting economic resilience and equal access to essential energy services for vulnerable communities. In essence, energy renovation in the residential sector must not be viewed as purely a climate action tool but also as a fundamental poverty reduction measure which can improve quality of life and increase resilience.

This report puts forwards a set of policy recommendations to better address energy poverty through renovation. The main themes highlighted in this report explore ways to improve the targeting of the most vulnerable in our society, facilitate energy renovation for all, improve affordability, and increase investments in the social housing stock. It also highlights the importance of renewable energy sources, as renovation on its own may not always be sufficient to bring people out of energy poverty. Research indicates that although improving the BER of a home is key to improve health and wellbeing, and an important anti-poverty measure, many households may still be paying more than 10% of their annual net income to heat their home, and may still remain in energy poverty, post renovation (SVP, 2023). Therefore, these energy efficiency measures need to be complemented by support for renewable energy sources and/or battery storage to ensure that heating and energy costs are kept to a minimum.

Note: Labour and skills shortages also present a significant challenge to the successful implementation of the national renovation strategy and achievement of Government targets. Recommendations on capacity constraints are beyond the scope of this research and are therefore not explored in great details in this report⁴. However, some of the recommendations included in this document, such as prioritising the worst performing part of the stock, and better supporting project aggregation should assist in making a better use of limited resources.

⁴ For further information on this topic, please see the findings of the Build Up Skills Ireland 2020 project at <https://www.igbc.ie/busi2030/>.

Methodology

The recommendations presented in this report were developed through extensive desk research, complemented by in-depth stakeholder engagement between August and December 2023. This included one-to-one interviews, workshops, and focus group discussions. A full list of stakeholders is available on p. 26-27. The detailed methodology is presented below.

Phase 1 - Uncovering realities

August - October 2023

- **Literature Review:** Key policies (e.g. Ireland's Energy Poverty Action Plan and Climate Action Plan 2023) and research papers (e.g. ESRI (2022) Fuel poverty in Ireland: an analysis of trends and profiles; ESRI (2022) Energy poverty and deprivation in Ireland) were gathered and reviewed with a focus on the impact on households experiencing energy poverty in Ireland.
- **Existing schemes to support energy renovation in Ireland** were reviewed. These included the Energy Efficiency Retrofitting Programme (EERP) funded by the Department of Housing, Local Government, and Heritage (DHLGH) to support the retrofit of local authorities' social housing stock, as well as the Sustainable Energy Authority of Ireland's (SEAI) One Stop Shop (OSS), Individual Energy Upgrade Grants and Fully Funded Energy Upgrade programmes.
- **Stakeholder mapping exercise**
- **Fifteen one-to-one interviews** were held with key stakeholders to better identify key barriers and challenges around energy renovation and energy poverty in Ireland.
- **A workshop** was held (12th Oct.) to gain a better understanding of what is currently working or could be improved, and to start developing solutions.
- All findings from the literature review, structured interviews and the workshops were subsequently used to generate a series of ideas to better address energy poverty through energy renovation. Some of the most promising ideas were tested in phase 2.

Phase 2 - Testing ideas

November - December 2023

Six Focus Group meetings were organised with a list of promising ideas to be tested during each meeting to discuss how they would work in Ireland and ensure they would be well suited to the Irish context.

1. Making local authorities' energy renovation programme work for energy poor households (22nd November)

Key ideas tested: Mapping and prioritising the least efficient part of the stock; Leading by example - Increasing overall targets and ambition; Ensuring additional resources are allocated to energy renovation; Improving coordination with energy renovation of privately owned properties; Improving communications with tenants, looking at examples such as the Green Doctors initiative in the UK, and the "school of tenants" in France.

2. Making Approved housing bodies' (AHBs) energy renovation programme work for energy poor households (24th November)

Key ideas tested: Mapping and prioritizing the least efficient part of the stock; Ensuring technical support is made available to AHBs; Ensuring additional resources are allocated to energy renovation and renewables; Improving communications with tenants, looking at examples such as the Green Doctors initiative in the UK, and the "school of tenants" in France.

Methodology continued

3. Making energy renovation more accessible to groups most at risk of energy poverty (30th November)

Key ideas tested: Targeting households most at risk of energy poverty; Supporting households most at risk of energy poverty through the renovation journey; The role of dedicated helplines and support offices; Improving guidance for occupiers and post-retrofit support.

4. Focusing on area-based energy renovation to better address energy poverty (8th December)

Key ideas tested: Identifying areas most at risk of energy poverty; Project aggregation at scale; Addressing energy poverty through shared renewable energy schemes.

5. Making energy renovation more affordable for households most at risk of energy poverty (11th December)

Key ideas tested: Making the best use of limited funding and resources; Reviewing SEAI's Free Energy Upgrade Scheme; Reviewing SEAI's One Stop Shop and Individual Energy Upgrade Grants; Alternative Finance.

6. Addressing energy poverty in the rental sector (13th December)

Key ideas tested: Regulatory framework: The role of Minimum Energy Performance Standards; Financial and technical support mechanisms. E.g. Reviewing existing free energy upgrade schemes to support tenants with long term leases / receiving Housing Assistance Payment; and/or exploring alternative mechanisms, e.g. the Italian superbonus scheme.

Phase 3 - Final recommendations

December 2023 - January 2024

- Based on the findings of phases 1 and 2, a draft list of key recommendations was developed.
- The draft recommendations were shared with relevant stakeholders in order to get final feedback on the recommendations.
- March 2024 - Final Report published.

About this Report

This research was funded by Friends of the Earth (FoE) Ireland with support from the European Climate Foundation. The research and stakeholder engagement process were carried out by the Irish Green Building Council between August 2023 and January 2024 with input from FoE and all stakeholders listed on p. 26-27.

RECOMMENDATIONS

Note: A timeframe is associated with each of the recommendations. Short-term indicates implementation within one to two years, while medium-term signifies two to five years and anything beyond that is described as long-term.



Develop and Implement a Comprehensive Approach to Tackle Energy Poverty

Recommendation	Lead	Other Partners	Timeline
<p>I Review and update SEAI’s overall mandate to include a greater focus on supporting those most at risk of energy poverty and facilitate more holistic renovations.</p> <p>This will ensure that the impact of the transition is “equitable and existing inequalities are not exacerbated” (Ireland, 2023). Giving a greater mandate to SEAI to facilitate more holistic renovations would help in tackling whole life carbon emissions, while addressing issues around the lack of coordination among funding streams for energy renovation, reuse of buildings, adaptability, etc⁵. In addition to better supporting the most vulnerable in society, it also represents better value for money, ensuring a better use of public finance and limited resources. Better supporting the most vulnerable through the energy renovation journey is also critical to bring everyone on board and deliver on Ireland’s climate targets.</p>	DECC	Department of an Taoiseach, DHLGH, DPENDR, SEAI	Short-term

⁵ For instance, ensuring that vulnerable households can access information on energy renovation and adaptability grants in one place, and that the work can be completed in one go, was raised by several stakeholders as an issue through the consultation process.



Develop and Implement a Comprehensive Approach to Tackle Energy Poverty *continued*

2	<p>Create a national cross-disciplinary permanent working group to provide leadership in addressing energy poverty. Energy poverty is a complex and multifaceted phenomenon. It requires cross-departmental cooperation and extensive engagement with civil society and industry on an ongoing basis. The group would ensure an open and collaborative approach to the development and implementation of the Energy Poverty Action Plan.</p> <p><i>Note: While annual plenary sessions with key stakeholders organised by the Cross-Departmental and inter-agency Energy Poverty Steering Group are positive developments, more regular engagements are needed. The IGBC's stakeholder engagement process for this research as well as the energy research network led by ESRI could provide a model for such ongoing engagement.</i></p>	DECC	Cross-Departmental and inter-agency Energy Poverty Steering Group, SEAI, CSO, Renovation industry, Organisations dealing with vulnerable households	Short-term
3	<p>Review and broaden the definition of energy poverty to get an accurate picture of this complex phenomenon and to better address it.</p> <p>The definition should be accompanied by robust indicators to monitor its evolution. Besides the four main indicators included in the revised Energy Efficiency Directive - Directive (EU) 2023/1791, the set of indicators included in the 2020 Commission's Recommendation on energy Poverty (2020/1563) must all be considered. While research on this topic is currently being led by ESRI (see Energy Poverty Action Plan⁶), input by anti-poverty groups and industry (as per recommendation 2) should be sought.</p>	DECC	Cross-Departmental and inter-agency Energy Poverty Steering Group, SEAI, CSO, Renovation industry, Organisations dealing with vulnerable households	Short-term

⁶ (DECC, 2022)



Develop and Implement a Comprehensive Approach to Tackle Energy Poverty *continued*

4	<p>Complete a full review of Ireland’s National Retrofit Strategy on a regular basis to ensure it supports the most vulnerable in society and deliver real carbon savings</p> <p>The work should include reviewing the overall targets (e.g. BER B2 or cost optimal equivalent) and prioritisation on a regular basis, as well as piloting innovative, alternative approaches and mechanisms at scale, including targeted area-based approaches.</p>	DECC	DHLGH, Department of an Taoiseach, DSP, SEAI, Renovation industry, Organisations dealing with groups at risk of energy poverty	Short-term
5	<p>Develop high quality GIS maps at local authority level to identify areas at risk of energy poverty and actively prioritise these areas as part of all energy renovation programmes and for project aggregation (area-based renovation).</p> <p>Although this should reflect the updated definition of energy poverty (recommendation 3), in the interim, this could build upon the mapping exercise currently being completed by ESRI for the Government⁷ and may include layers such as households on social welfare, POBAL Deprivation Index, BER rating and actual energy use.</p> <p>Also see recommendations 13, 18, 28 and 29 on prioritisation and aggregation.</p>	DECC	DHLGH, ESRI, SEAI, local energy agencies, LGMA, local authorities, DSP, CSO, utility providers	Medium-Term
6	<p>Ensure all programmes to address energy poverty are co-designed with vulnerable groups and anti-poverty organisations</p> <p>This would require co-designing programmes and policies (and testing them) in conjunction with most vulnerable households and the renovation industry. This may be achieved through the expansion of the Energy Poverty Steering Group (see recommendation 2)</p> <p>(Continued on the next page)</p>	DECC/ DHLGH	DSP, Department of Health, SEAI, Renovation industry, Organisations dealing with vulnerable households, people experiencing energy poverty	Medium-Term

⁷ Under Ireland’s Energy Poverty Action Plan 2022, ESRI was tasked to prepare a map of the deprivation and energy efficiency distribution in Ireland (DECC, 2022).



Develop and Implement a Comprehensive Approach to Tackle Energy Poverty *continued*

or with the recruitment of energy poverty officers in DECC/SEAI/DHLGH to ensure all policies, programmes and communications are reviewed to support the most vulnerable households. Direct engagement with groups experiencing energy poverty is also critical. This could be achieved through an acceleration of the roll out of the Healthy Age Friendly Homes Ireland programme and by replicating this model for other groups identified as at risk of energy poverty⁸.

7 Set up a forum to share energy renovation best practices of the social housing stock

The forum should encourage an increased collaboration between local authorities and Approved Housing Bodies (AHBs) so that they can learn from each other. This should cover both technical and behavioural change aspects of energy renovation.

DHLGH

LGMA, Local Authorities, DECC, SEAI, Approved Housing Bodies, AHB Strategic Forum⁹, ICSH, IGBC

Short-term

8 Introduce minimum energy efficiency performance standards (MEPS) in the private rental market and gradually increase it to support the full decarbonisation of our housing stock.

Make clear that minimum energy efficiency performance standards will be introduced for private rental properties in accordance with Housing for All's objective "to implement minimum Building Energy Renovations (BER), where feasible, for private rental properties", and with the proposed revision of the Energy Performance of Buildings Directive (EPBD). This should be flagged well in advance and introduce alongside technical and financial measures to support small landlords and tenants – see recommendation 15, 23, 24 and 25.

DHLGH

DECC, RTB, LGMA, organisations representing landlords (e.g. IPOA and Apartment Owners Network) and tenants (e.g. Threshold, CATU), renovation industry

Medium-term

⁸ Established in 2018 as a shared service function of the local government sector Age Friendly Ireland coordinates the national Age Friendly Cities and Counties Programme. The national Age Friendly Ireland Office is hosted by Meath County Council on behalf of the local government sector. The Healthy Age Friendly Homes Programme works closely with elderly people and carries out assessments on their homes to establish the necessary supports to allow them to continue to live in their own home. It is jointly led by 9 Local Authority areas.

⁹ The AHB Strategic Forum has been established to consider a range of strategic long-term issues facing the sector and to set a vision for the sector over the next 10 years. Membership of the Forum includes representatives from the AHB sector, Housing Agency, Housing Finance Agency, City and County Managers' Association (CCMA) Housing Building and Land Use Committee and relevant officials from across the Department. The forum will focus on the four themes: (i) Strategic; (ii) Management (iii) Delivery and (iv) Financial. Addressing energy efficiency, the upgrading and maintenance of units will be one of several key issues examined by the forum.



<p>9</p>	<p>Mandate and fully fund the development of Renovation Passports for shallow energy renovation works receiving public funding by 2026 at the latest¹⁰.</p> <p>Renovation passports are “tailored roadmap for the deep renovation of a specific building in a maximum number of steps that will significantly improve its energy performance” (Commission, 2021). While preference should be given to deep renovations that have a greater impact potential, this action will ensure that all “shallow retrofit” taking place with state support will eventually lead to highly energy efficient, comfortable homes.</p> <p>In the private sector, this would ensure that households that are not eligible for free energy upgrades but cannot afford a deep retrofit (one-stop-shop model), implement single measures in the right order, i.e., in a way that allows them to work towards a highly energy efficient, comfortable home over time. In the social housing sector, it will ensure that all shallow retrofit works (including repair and maintenance) also lead over time to highly energy efficient, comfortable homes. In the rental sector, this is key in ensuring minimum energy performance standards (Recommendation 8) do not create lock-ins and in preventing “renoviction”.</p>	<p>DECC</p>	<p>DHLGH, SEAI, AHBs, Renovation Industry, Organisations working with vulnerable households</p>	<p>Medium-term</p>
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¹⁰ Under the proposed revision of the Energy Performance of Buildings Directive, Renovation Passports must be made available by member states as a voluntary tool to building owners by 2026 (Commission, 2021).



Facilitate energy renovation for all

	Recommendation	Lead	Other Partners	Timeline
10	<p>Develop and implement a combined bottom-up and top-down approach to better target households at risk of energy poverty. The Government should ensure that resources are in place to identify on the ground and target information at energy poor households – See recommendations 5 on mapping and 12 and 13 on setting up a network of energy renovation advisors. This may be complemented by a national awareness campaign targeting households at risk of energy poverty and framed around linking retrofitting to lower bills and healthier homes.</p>	DECC	Department of an Taoiseach, DHLGH, DPENDR, SEAI	Short-term
11	<p>Directly target households at risk of energy poverty with available schemes by sending information to all eligible households Despite current waiting times under the free energy upgrade scheme¹¹, alternative ways to better reach out to households at risk of energy poverty should be tested. E.g. greater cooperation with the Department of Social Protection and the Department of Health to identify and target households that may be eligible for the SEAI free energy upgrade scheme.</p>	DSP/ Dep. Of Health	DECC, Department of an Taoiseach, SEAI, HSE	Medium-term
12	<p>Set up an extensive network of independent energy renovation advisors across the country¹² Pilot initiatives may be initially required to ensure appropriate implementation. These renovation advisors would use their local knowledge to work with anti-poverty groups and other relevant NGOs to better identify and target households at risk of energy poverty, signpost all information on renovation (from energy efficiency to adaptability grants and relevant allowances) and support project aggregations – Also see recommendations 5, 13, 28 and 30. (Continued on the next page)</p>	DECC	DPENDR, DHLGH, Department of an Taoiseach, SEAI, SECs, Local Energy Agencies, Local Authorities, Citizens Information, Renovation Industry, Organisations working with vulnerable households	Short-term

¹¹ The current waiting list for the Free Energy Upgrade Programme is approximately 20 months.

¹² Under the proposed revision of the EPBD, Member States shall ensure that technical assistance facilities are available across their territory by establishing at least one one-stop-shop per 80 000 inhabitants (Commission, 2021). A similar approach could be taken here.



Suggestions put forward as part of this research is that these advisors may be based in local energy agencies (where available), or Citizens Information Offices and libraries and employed by SEAI – e.g. perhaps as part of a SEC Mentor + programme.

13 Task the network of energy renovation advisors (recommendation 12) to work with communities, anti-poverty groups, etc. to identify vulnerable households on the ground, coordinate support through the renovation journey and support project aggregation.

Building upon the map developed in 5, the network of renovation advisors would be responsible for coordinating with relevant community groups, NGOs, etc. on the ground to identify vulnerable households, support them through the renovation journey - e.g. through guidance with the grant application process, and support project aggregation.

14 Train relevant professionals to recognise energy poverty and identify those most at risk

Social workers, healthcare professionals, as well as liaison officers in (e.g.) schools, libraries and churches should be made aware of energy poverty, how to recognise it, as well as the benefits of energy renovation and support available. Their role should be to make vulnerable households aware of the benefits of retrofitting and to signpost them to energy renovation advisors/ places where they can get information on schemes available. A simple, easy to implement first action could be to have information on the free energy upgrade programme in GPs' waiting room, highlighting the links between renovation and health.

DECC

DHLGH, DSP, SEAI, SECs, Local Energy Agencies, Local Authorities, Renovation Industry, Organisations working with vulnerable households

Medium-term

DECC, DSP, Dep. Of Health

SEAI, HSE, Department of Education, Organisations working with vulnerable households, Education providers, Professional bodies

Medium-term



15	<p>Provide better and more accessible information on energy renovation to households most at risk of energy poverty</p> <p>Many energy poor households have difficulty accessing reliable information on energy renovation and its benefits. This could be achieved through simple videos/ infographics. Literacy and digital literacy issues should be considered, as well as translation into other languages. This should be available online and in Citizens Information Offices, libraries, etc. for accessibility.</p> <p>Developing a simple list of questions that people need to ask their retrofit installer and explaining some common misconceptions about retrofits would also be helpful.</p> <p>It is also important to develop transparent, high-quality information on energy renovation for both landlords and tenants, and ensure it is shared through trusted, trained intermediaries e.g. IPOA, Network of Apartment Owners, Thresholds, CATU.</p>	SEAI	DECC, DHLGH, Citizens Information, Renovation Industry, SEAI, Organisations working with most vulnerable households, RTB, landlords and tenants' representatives e.g. Irish Property Owners Association/ Threshold	Short-term
16	<p>Train contractors and one-stop-shops on communications on energy renovation, including communications with vulnerable groups to better support them through the renovation journey. This would require engaging with anti-poverty groups who have the relationship and expertise when it comes to communicating with vulnerable groups. The training should cover energy management advice and delivering practical information on how to efficiently use new technologies such as heat pumps and MVHR.</p>	SEAI	Solas, ETBI, Education providers, Renovation Industry, Groups working with vulnerable households	Short-term



Make energy renovation more affordable for all

Recommendation	Lead	Other Partners	Timeline
<p>17 Review the criteria of the SEAI Free Energy Upgrade Programme on a regular basis to ensure it provides additionality and that the most vulnerable groups in society have access to it.</p> <p>Currently, certain groups at risk of energy poverty such as those in the private rental market are not covered in the free energy upgrade scheme. Government should consider opening the scheme to tenants receiving HAP, on the condition of a long-term lease being offered. The Government should explore the “<i>Ma Prime Renov</i>” scheme in France whereby a landlord needs to commit to renting out the property to the eligible tenant for at least 5 years post-retrofit. In the Irish context, the term could be scaled depending on the level of renovation.</p>	DECC	DPENDR, DSP, SEAI, organisations working with the most vulnerable	Short-term
<p>18 Further prioritise homes as part of the free upgrade scheme</p> <p>While the Warmer Homes Scheme already prioritises houses with a pre-works BER rating of E, F and G, and a year of construction pre-1993, better targeting of the most vulnerable households through GIS mapping (recommendation 5) and the network of energy renovation advisors (recommendations 12 and 13) would support a greater prioritisation¹³. In the meantime, interim actions such as further prioritising households based on annual income (e.g. based on the P60 form) and signing them to pilot projects while they are on the waiting list should be explored.</p>	DECC	DPENDR, DSP, SEAI, energy suppliers, organisations working with the most vulnerable, renovation industry	Medium-term

¹³ Based on the GIS mapping (recommendation 5), the energy renovation advisors (recommendation 12) would work with community groups and anti-poverty groups to directly target and support the most vulnerable groups in their energy renovation journey.



19	<p>Streamline the Free Energy Upgrade Programme and further support aggregation to speed up energy renovation of these homes.</p> <p>Building upon the mapping exercise mentioned in recommendation 5, and the network of energy renovation advisors – recommendations 12/13, better aggregate projects at local level (including social housing – where possible – see recommendations 28 and 30) to speed up energy renovation and deliver economies of scale.</p>	DECC	DPENDR, DHLGH, DSP, SEAI, energy renovation industry, organisations working with the most vulnerable	Medium-term
20	<p>Enhance the support for renewable technologies</p> <p>While energy efficiency first must remain the priority to improve comfort, etc., research shows that energy renovation on its own is not enough to bring everyone out of energy poverty. Renewable solutions (such as solar PV) should be made more accessible for energy poor households through schemes such as “Warmer Homes”¹⁴. The Government should consider widening the roll out of innovative approaches such as Energy Cloud to private homes eligible for the SEAI free upgrade scheme.</p>	DECC	DHLGH, SEAI, DPENDR, DSP, CRU, Energy Providers, Organisations representing vulnerable households, renovation industry	Medium-term
21	<p>Review funding mechanisms to address energy poverty on a regular basis to ensure innovative technologies that support carbon and financial savings are eligible.</p> <p>Address issues around the need for an Irish certification for products to be eligible for SEAI funding. Most products suitable for renovation of traditionally built buildings do not have such a certification, meaning that there is no funding to retrofit most pre-1945 homes¹⁵. New technologies, such as district heating or batteries¹⁶, which could provide households with more energy efficient, cheaper to operate homes should also be considered – at least as part of pilot programmes.</p>	DECC	SEAI, DHLGH, NSAI, energy suppliers, energy renovation industry, organisations working with the most vulnerable	Short-term

¹⁴While there is a free solar panel scheme for the “medically vulnerable”, solar PV is not currently covered under the SEAI free energy upgrade scheme.

¹⁵(O’Doherty Caroline, 2023)

¹⁶E.g. the RED WoLF project developed a system that merges batteries and storage heaters to provide heat on demand whilst also storing low-carbon energy drawn from the national grid at times of low demand using new.



22	<p>Pilot and introduce new schemes to better support households falling just above the free energy upgrade threshold.</p> <p>Many energy-poor households cannot avail of the free energy upgrade scheme as they fall just above the eligibility criteria. In addition to free renovation passports for single measures (recommendation 9), other actions should be considered and piloted. These include introducing a sliding scale on the rate of grants based on income as part of a Warmer Homes Plus scheme – See “Ma Prime Renov” in France, or the low interest loans in the Netherlands for example, or an equity release scheme for asset rich/cash poor households to allow them afford the renovation costs.</p>	DECC	DPENDR, DSP, SEAI, energy renovation industry, energy suppliers, organisations working with the most vulnerable	Short-term
23	<p>Complement these pilots through the introduction of low interest loans and finance, including for landlords – e.g. renovation loans below 2% as per international best practice¹⁷ or a ‘bullet loans’ as in Flanders – up to €50,000 for up to 20 years at 0% interest, which is repaid at the point of sale or refinanced after 20 years.</p>	DECC	DPENRD, SEAI, Central Banks, HBFI, BPII, Renovation Industry, organisations working with the most vulnerable	Medium-term
24	<p>Provide additional financial support to smaller landlords to address energy poverty in the rental market, i.e. review the current tax break of €10,000 available for landlords completing certain energy renovation projects and assess whether this could be provided in the same year that retrofitting work is completed.</p>	DFIN	DHLGH, DECC, IPOA and property owner associations	Short-term
25	<p>Pilot a mechanism similar to the Repair and Leasing Scheme to support energy renovation of rented properties. This would provide an incentive, particularly to small landlords that may not have the financial or technical capacity to retrofit their properties.</p>	DHLGH	DPENDR, DECC, IPOA and property owner associations	Medium-term

¹⁷ This could build upon the Home Energy Upgrade Loan Scheme to be introduced later this year.



Invest in energy renovation of social housing

	Recommendation	Lead	Other Partners	Timeline
26	Increase funding for energy renovation of the local authorities' social housing stock to ensure the worst performing part of the stock can be effectively prioritised and that all aspects of energy renovation works - including mechanical ventilation and scaffolding to renovate apartment blocks¹⁸ – are covered.	DPENDR	DHLGH, LGMA, Local authorities, local energy agencies	Medium-term
27	Set up a multi-annual strategy (e.g. 10 years) for the retrofit of local authorities' social housing stock so that all local authorities have greater clarity on targets and budget allocation for the next decade and can adequately prepare for same.	DPENDR	DHLGH, Department of Finance, LGMA, Local Authorities, Local energy agencies	Medium-term
28	Improve funding for the energy renovation of the AHBs' stock. The current level of funding made available to AHBs through SEAI grants to retrofit their stock make it extremely challenging for them to retrofit the worst performing part of the stock. This funding must either be increased to match funding made available to local authorities under the EERP scheme or alternative finance options should be introduced to bridge the gap – e.g. zero/low interest loans. Better support for project aggregation (see recommendation 19) may also help in reducing cost ¹⁹ .	DECC	DHLGH, DPENDR, SEAI, AHBs, AHB Strategic Forum ²⁰ , HBFI, ICSH	Short-term
29	Require social housing providers (local authorities and AHBs) to further prioritise the worst performing part of the stock, where practical. For example, through a prioritisation of homes with a pre-works BER rating of E, F and G, and a year of construction pre-1993, as is already done under the Warmer Homes Scheme.	DHLGH, DECC	DPENDR, LGMA, Local authorities, local energy agencies, AHBs, AHB Strategic Forum, ICSH	Medium-term

¹⁸ As of February 2024, local authorities cannot access funding under the Energy Efficiency Retrofitting Programme to cover the cost of scaffolding to renovate apartment blocks or the cost of mechanical ventilation. This is because the EERP funds energy efficiency measures to Cost Optimal level of B2 or Cost Optimal Equivalent as described in Table 7 of TGD L Dwellings, and Mechanical Ventilation is not one of them. It is intended that Building Regulations will be further updated to adopt the 2023 Cost Optimal calculations no later than Q1 2025 (Ireland, 2023).

¹⁹ Also see Recommendation 9 on Renovation Passports on how it can better support phased renovation, including in social housing.

²⁰ The AHB Strategic Forum has been established to consider a range of strategic long-term issues facing the sector and to set a vision for the sector over the next 10 years. Membership of the Forum will include representatives from the AHB sector, Housing Agency, Housing Finance Agency, City and County Managers' Association (CCMA) Housing Building and Land Use Committee and relevant officials from across the Department. The forum will focus on the four themes: (i) Strategic; (ii) Management (iii) Delivery and (iv) Financial. Addressing energy efficiency, the upgrading and maintenance of units will be one of several key issues examined by the forum.



30	<p>Support social housing providers in testing new innovative ideas in their energy renovation projects. E.g. work with energy renovation advisors (Recommendation 12) to support aggregation, scale up Post Occupancy Evaluations, carry energy renovation works taking a whole life carbon approach (including transport²¹) to inform Ireland’s National Retrofit Programme. With appropriate level of funding, local authorities’ decarbonising zone could be used as testbed for these innovative ideas – perhaps in conjunction with the GIS maps (Recommendation 5).</p>	DHLGH	<p>DECC, DPENDR, SEAI, LGMA, Local Authorities, Local energy agencies, AHBs, AHB Strategic Forum, ICSH</p>	Short -term
31	<p>Further support the installation of renewable technologies within the social housing stock. This could be achieved through an acceleration of the roll out of innovative approaches such as Energy Cloud (or similar models) to all social housing providers, and /or by considering extending the new requirement to install solar PV in existing public buildings under the proposed revision of the EPBD to all social housing stock (where feasible).</p>	DECC	<p>SEAI, DHLGH, LGMA, Local Authorities, AHBs, AHB Strategic Forum, ICSH, CRU, Utility Providers, Organisations representing vulnerable households, renovation industry</p>	Medium-term
32	<p>Better support social housing providers in recruiting and training tenants’ liaison officers to explain the benefits of energy renovation, the process, and the use of new technologies (including heat pump and MVHR) in simple terms. See also recommendations 6, 12, 14, 15 and 16.</p>	DECC/ DHLGH	<p>DPENDR, LGMA, Local Authorities, AHBs, AHB Strategic Forum, ICSH, Organisations representing vulnerable households, Training, and education providers</p>	Medium-term

²¹ Taking this whole life carbon approach that includes access to active and public transport (where feasible) would be important not only in addressing energy poverty but also transport poverty.



33	<p>Review and increase (where appropriate) resources allocated to LAs to ensure they have the right skill set to renovate their housing stock and improve staff retention</p> <p>More specifically, further upskilling in the following areas may be required to increase inhouse expertise: Carbon literacy, energy efficiency, low carbon renovation and green public procurement (GPP). Mechanisms should also be considered to encourage and support local authorities in pooling their resources together at regional level, so that staff can become experts on specific themes and share their expertise. This would ensure all local authorities have access to the right skillsets, including GPP and renovation of traditionally built buildings.</p>	DHLGH	DPENDR, DECC, LGMA, Regional assemblies, local energy agencies, Solas, ETBI, Construction Professional Bodies	Medium-term
34	<p>Increase the level of technical support for AHBs,</p> <p>Ensure AHBs have access to independent renovation advisors to ask technical and financial questions. This would allow them to review renovation works suggested by One-Stop-Shops and make more informed decisions. This could be funded through some AHBs pooling their resources together to recruit a person for this role. These advisors could also work with energy renovation advisors – see recommendations 12 and 13 – and support project aggregation across AHBs.</p>	AHBs	DECC, DHLGH, AHB Strategic Forum, SEAI, ICSH	Medium-term

CONCLUSION

The budget allocated to energy renovation, including for households at risk of energy poverty, has increased significantly in recent years. In 2023, the budget for the SEAI Warmer Home scheme was €157 million. It will be just shy of €210 million this year. The budget allocated to the energy renovation of local authorities' social housing stock (Energy Efficient Retrofit Programme) has also increased from €85 million in 2022 to €90 million in 2024. While the implementation of these programmes has led to a decrease in carbon emissions associated with the residential sector, almost a third of Irish households remain at risk of energy poverty. Against this background, this report makes a series of recommendations for a national renovation strategy that includes and delivers for those at risk, or in, energy poverty.

More specifically, it calls for a review of the national retrofit programme on a regular basis to ensure it delivers real carbon savings and truly supports those households that will face the greatest challenges in the energy transition²². A key element of this approach is to better identify, target and prioritise those most at risk of energy poverty through a mapping exercise, complemented by the set-up of a network of energy renovation advisors across the country. Such advisors would work in close cooperation with community organisations and anti-poverty groups to identify those most at risk of energy poverty and support them through the energy renovation journey (e.g. to complete grants applications). These advisors could also support project aggregation at local level, working in close collaboration with local authorities, approved housing bodies and SEAI, hence delivering economies of scale.

As those living in social housing are often a clear group of people that are at risk of energy poverty, the report includes a recommendation to further

prioritise the energy renovation of this part of the stock. Funding should be available for local authorities and AHBs to prioritise the worst performing stock²³ and the process should be streamlined to provide certainty. The social housing renovation programme could also be better used to test innovative ideas (e.g. Post Occupancy Evaluations and low carbon renovation) to improve the delivery of the national retrofit programme.

To make energy renovation more affordable for all, it would be important to review the criteria of the free energy upgrade scheme on a regular basis, as well as to pilot alternative funding mechanisms for groups at risk of energy poverty which are not currently covered under the scheme. Research shows that energy renovation on its own is insufficient to address energy poverty. Consequently, the development of, and access to, renewable energy should be further supported. Labour and skills shortages remain one of the biggest challenges to a successful implementation of Ireland's National Renovation Strategy. Reviewing and updating the SEAI's overall mandate to include a greater focus on supporting those most at risk of energy poverty and facilitate more holistic renovations could help in making better use of limited resources and in better supporting vulnerable households on the ground. For instance, ensuring that vulnerable households can access information on energy renovation and adaptability grants in the one place was raised by several stakeholders through the consultation process. This would not only support vulnerable households in their renovation journey but could also contribute to a reduction in whole life carbon emissions. With 2023 being the warmest year on record and with vulnerable communities often more exposed to extreme weather events, it will also become increasingly important to consider climate adaptation as part of all renovation programmes.

²² This is fully aligned with the objectives of the European Green Deal which "stresses that the transition must be fair and inclusive, putting people first and paying particular attention to supporting those regions, industries, workers, households, and consumers that will face the greatest challenges in that transition". (European Commission, 2019)

²³ This is aligned with the 2023 European Commission Recommendation on Energy Poverty which details that priority should be given to the renovation of buildings with the worst energy performance to directly address energy poverty, since people affected by energy poverty and vulnerable people tend to live in such buildings (European Commission, 2023).

Thank you

We would like to thank all participants who attended and contributed to our workshop, focus group meetings, and the development of these recommendations through one-to-one interviews and meetings.

Organisation ²⁴	Organisation Type
Age Action	NGO
Age Friendly Ireland	Other Public
Alone	NGO
BER Association	Industry
Bord Gáis	Energy Providers
Carbery Housing Association	Social Housing Provider
Central Statistics Office	Central Government
Ciaran Ferrie Architects	Industry
Climate Change Advisory Council	Central Government
Clúid Housing	Social Housing Provider
Cooperative Housing	Social Housing Provider
Cork City Council	Local Government
Department of Housing, Local Government and Heritage	Central Government
Department of Public Expenditure, National Development Plan Delivery and Reform	Central Government
Disability Federation Ireland	NGO
Dublin City Council	Local Government
Ecological Building Systems	Industry
Energy Communities Tipperary Cooperative	Other
Envirobead	Industry
Fingal County Council	Local Government

²⁴Please note recommendations set out in this report have been raised by organisations in meetings with the IGBC but have not been endorsed by all organisations listed.

Thank you *continued*

Friends of the Earth	NGO
Greenwatt	Industry
Housing Agency	Central Government
Health Service Executive	Other public
Irish Council for Social Housing	Social Housing Provider
Irish Property Owners Association	Industry
Irish Rural Link	NGO
KORE retrofit	Industry
Limerick County Council	Local Government
Local Government Management Agency	Local Government
MABS	Other public
National Women Council of Ireland	NGO
Oaklee Housing	Social Housing Provider
Respond	Social Housing Provider
Retrokit	Industry
Rodd Bond Architect	Industry
Sustainable Energy Communities – Dublin City Council	Other
Social Justice Ireland	NGO
South East Energy Agency	Local Government
SSE	Utility Provider
St. John of God Housing Association	Social Housing Provider
St. Vincent de Paul	NGO
Sustainable Energy Authority Ireland	Other Public
Threshold	NGO

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