



Irish Rural Link
Nasc Tuaithe na hÉireann

Submission to Development of new Solid Fuel Regulations

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Contact



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Overview

Irish Rural Link (IRL) is the national network of rural community groups, representing over 600 groups and thousands of individuals committed to socially, environmentally and economically sustainable rural communities.

We welcome the opportunity to make a submission to the consultation on the development of a new Solid Fuel Regulation for Ireland. IRL understand the need to regulate the use of solid fuel as well as fossil fuels, not only to reach carbon emission targets but also to improve air quality and improve people's health.

However, we would have a number of concerns and would call for a cautious and careful approach to introducing new regulations on the use of solid fuel. This is to minimise the impact such regulations will have on those who are dependent on solid fuel to heat their home and who are living in or at risk of fuel poverty. Sufficient time and supports need to be provided so people can make the necessary changes to their home heating system.

Rural households will be most impacted by these new regulations because of the nature of the rural housing stock, especially older stock, that are very much reliant on solid fuel heating systems. Rural households are also at greater risk of fuel poverty and with the continued increase in carbon tax on coal and briquettes, more households continue to feel the impact of this.

The SILC¹ report 2019² (most recent figures available) showed that 26% of those at-risk-of poverty went without heating at some stage throughout the year. This was a significant increase from 19% in 2018. 14.7% of those at-risk-of poverty were unable to adequately heat their home in 2019. Among households living in consistent poverty; 52.5% went without heating at some stage throughout the year, again, a significant increase from 42.8% one year previously and 34.4% were unable to adequately heat their home compared to 29% in 2018.

IRL welcome the continued supports available, through SEAI grant schemes, to help households make their homes more energy efficient and grants to change to electric heat pumps. However, not every household is eligible for some of these grants such as the warmer homes and the financial outlay to access the deep retrofit grant is too large for many.

IRL continue to call on the introduction of grants to support households to convert heating systems in their home to wood pellet, gas etc. and not just electric heat pumps with revenue raised from carbon tax ring-fenced to finance this.

¹ SILC – Survey on Income and Living Conditions

² CSO (2020) – Survey on Income and Living Conditions (SILC) 2019

<https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2019/povertyanddeprivation/>

The following are a number of recommendations on the questions posed in the consultation paper that are most relevant to IRL members that must be considered before regulations are introduced to ensure people are not made worse off.

Q1. Are you in favour of a national regulation on solid fuels, and if so, why?

IRL are cautious at the introduction of a national regulation on solid fuels. While IRL understand that there needs to be a move away from the use of solid fuels in the generation of heat and energy in people's homes for both environmental and health reasons, we are concerned that these regulations will have a negative impact on low income households. More investment needs to be made in supporting households to convert solid fuel heating systems to cleaner alternatives as well as making their homes more energy efficient. IRL believe these measures must be in place prior to regulations being enforced and that households and communities are engaged with throughout the process.

Q5. How can a transition to less polluting fuels and more efficient heating systems be supported?

Engaging with households and communities who rely on solid fuels to heat their homes should be a key priority for the Government in transitioning to less polluting fuels. This means educating people and raising awareness of why there is a need to move away from polluting fuels and what cleaner alternatives are available in their area, if these alternatives are more expensive or cheaper and if there are supports available to change to these alternatives. Those who will be impacted most by these new regulations must be engaged with the most and not left behind. These include; households living in or at-risk of fuel poverty, older people who may not have confidence in the alternative fuels or do not see it as worthwhile to make physical changes to their home or their heating system and private landlords, Local Authorities and Approved Housing Bodies who own the homes people live in.

Investments in grants and schemes to support households make the necessary changes in their homes to convert heating systems to greener alternatives is needed. A sufficient proportion of revenue raised from carbon tax must be ring-fenced to fund these grants. Low interest rate loans similar to those available by An Post for retrofitting your home should be part of this scheme also. Engaging with those most hard to reach on these schemes should be a priority and encouraging Local Authorities, Approved Housing Bodies and private landlords to take part in the schemes is needed.

IRL worked with SEAI in hosting information evenings on the grants available to improve the energy efficiency in homes across the country. These included public information events on the Deep Retrofit Programme, Better Energy Homes and Warmer Home schemes. IRL recommend a similar approach be taken here.

Q6. What do you think is an appropriate timeframe for the implementation of a national regulation of solid fuel?

IRL believe, at a minimum, five years is an appropriate timeframe for the implementation of a national regulation of solid fuel. There needs to be sufficient time given to households to make changes to their homes – whether this is to retrofit and/or change heating system being used at present and to use solid fuel they have purchased. With the ending of peat harvesting of briquettes and the last briquette factory to close by 2024, there is already a shortage in supply in this solid fuel which has led to an increase in imports. However, the majority of rural homes use this form of solid fuel to either fully heat their home or supplement oil heating. Households cannot make changes overnight and need to find the best alternative for them and their home.

Q7. What timeframe should be applied to the inclusion of new solid fuels into legislation to allow for the necessary transition, including the phase out of existing stocks?

IRL believe, again at a minimum, 5 years will be needed to allow for the necessary transition and phase out stock. As mentioned above, the last peat briquette factory is due to close in 2024 however, there is still a demand for this fuel type to heat people's homes. There needs to be sufficient time to allow people make the necessary changes to move away from the use of solid fuel but also to get accustomed to using cleaner alternatives.

Q8. Should suppliers and retailers be given a transition period to use up existing stocks of solid fuels not meeting emission standards and, if so, how long?

Yes. There should be sufficient time given to suppliers and retailers to use up existing stock of solid fuels and IRL would see this to take as long as every household has transitioned to less polluting and cleaner alternative fuels. The Government must also take into consideration the job losses that will occur as a result of ending the use of solid fuels. As mentioned in previous sections, the last peat briquette factory will close in 2024 and while there are some measures in place to upskill and reskill workers, IRL are aware that many of these courses have been postponed or suspended due to Covid-19. Also jobs in fuel retailers who specialise only in the sale of fuel will be impacted and supports for those employees but also the retailer itself must be established so they can diversify into the sale of greener fuels or other products. A plan for job losses must be developed, engaging with those workers that will be affected and ensuring there is a seamless transition to alternative sustainable jobs and/or livelihoods.

Suppliers and producers of solid fuel must also be engaged with and collaboration with the third level sector on researching new possibilities and opportunities to decarbonise some of these polluting solid fuels or how they can transition to the production of less polluting fuels should take place.

Q.9 Are there particular challenges in terms of the enforcement of regulations applying to solid fuel burning, and how might these be best addressed?

There will be a number of challenges in the enforcement of regulations to solid fuel burning and some of these have been addressed in previous sections. The main challenge on enforcement is ensuring that no person or household is negatively impacted by these new regulations.

As mentioned, the number of people living in consistent poverty or at-risk of poverty that went without heating at some stage during 2019 significantly increased and there was also an increase in these cohorts who were unable to adequately heat their homes. IRL would envisage these figures increasing further in 2020 as more people were in their homes each day during Covid-19. Also, the price of solid fuel has increased with the increase in carbon tax. With many of the alternative fuels still not available or affordable to many households, especially those mentioned here, IRL would be concerned that they will be further penalised for burning solid fuel if they are unable to change to alternative fuels.

IRL envisage there will be a need for a change in heating systems or some alterations made to current heating systems in a lot of rural houses, especially in older stock. Developing a grant scheme must be put in place to support households that do need to make changes can do so. Less polluting fuels such as dry wood, while burning alone will not produce the same level of heat in an open fire as some of the solid fuels that will be regulated, so people may need to install wood burning stoves or other heating sources. How a home is heated should be included in assessments for retrofitting and recommendations made on the best alternative to be used with the level of retrofitting being carried out and the necessary financial supports made available.

Engaging with households and communities that will be most impacted by these new regulations such as; marginalised and vulnerable groups as well as those working in the sector to ensure no one is left behind is a proactive way of addressing some of the challenges that may arise.

As mentioned in previous sections, IRL hosted a series of information evenings on SEAI grants available to improve the energy efficiency in homes across the country. These events helped to inform home owners not only on what grants were available but also what supports in terms of loans, assistance with completing application forms, etc. were available to make the changes and why the changes are necessary. A similar series of events could be undertaken as part of the introduction of these new regulations to assist people to make the necessary changes.

Q10. Do you have any further proposals to reduce air pollution from residential heating?

Energy efficiency is a key part of reducing air pollution from residential heating. The cheapest and cleanest source of energy is the one that needs little use. As mentioned in previous sections we welcome grants and schemes available for retrofitting and deep retrofitting of homes and have seen the impact of these grants on improving the warmth of homes and saving on bills. We also welcome that Local Authorities have begun the roll out of deep retrofitting their housing stock and replacing solid fuel heating systems with electric heat pumps. However, with a continued reliance on the private rental sector to supply social housing, there is a large proportion of those on low income and living in or at-risk of fuel poverty, that will not be able to benefit from retrofitting grants - unless the landlord makes the necessary changes. Also, households who may own their own home, especially older people and those on low income are unable to afford to make the changes needed.

Any new regulations introduced on solid fuels must be done in conjunction with an increase in availability and eligibility of retrofitting grants and grants to support conversion of heating systems in homes.

Irish Rural Link the Organisation

Irish Rural Link (IRL), formed in 1991, is a national network of organisations and individuals campaigning for sustainable rural development in Ireland and Europe. IRL, a non-profit organisation, has grown significantly since its inception and now directly represents over 600 community groups with a combined membership of 25,000.

The network provides a structure through which rural groups and individuals, representing disadvantaged rural communities, can articulate their common needs and priorities, share their experiences and present their case to policy-makers at local, national and European Level.

Irish Rural Link is the only group represented at the national social partnership talks solely representing rural communities' interests.

'Our vision is of vibrant, inclusive and sustainable rural communities that contribute to an equitable and just society'

Irish Rural Link's aims are:

- To articulate and facilitate the voices of rural communities in local, regional, national and European policy arenas, especially those experiencing poverty, social exclusion and the challenge of change in the 21st century.
- To promote local and community development in rural communities in order to strengthen and build the capacity of rural community groups to act as primary movers through practical assistance and advice.
- To research, critique and disseminate policies relating to rural communities including issues such as sustainability, social exclusion, equality and poverty
- To facilitate cross-border networking between rural communities

'Our mission is to influence and inform local, regional, national and European development policies and programmes in favour of rural communities especially those who are marginalised as a result of poverty and social exclusion in rural areas.'