

Submission to the Consultation Process on Regulation of Solid Fuels

Submitted by National Traveller MABS

March 2021



About National Traveller MABS

National Traveller MABS was formally established in 2005 and is fully funded by the Citizens Information Board (CIB). National Traveller MABS is a leading advocate for the financial inclusion of Travellers in Ireland.

We work to reduce poverty, discrimination and the financial exclusion of Travellers in Ireland. We work with the Traveller community and organisations to change policy and practice which impacts Travellers financially.

We aim to:

- Make MABS and Citizens Information more accessible to Travellers
- Work on the issues that cause Travellers to be financially excluded
- Provide and support community education programmes in financial literacy
- Work with other groups to improve the financial situation of Travellers

Our work involves helping Travellers access MABS and Citizens Information Services, as well as community education, research, and policy development

Travellers and energy poverty

National Traveller MABS is concerned with energy poverty amongst Travellers. From our work in the area of the financial inclusion of Travellers, we are aware that energy costs are a large part of family's weekly expenditure. This is more acutely the case of Travellers who live in mobile homes and trailers. 12% of Travellers live in mobile homes¹. A National Traveller MABS 2019 study² into energy poverty amongst Travellers living in mobile homes and trailers found:

- 40% of respondents in our study used coal/logs/sticks as a source of heat.
- 77% of Travellers living in mobile homes are in energy poverty.
- Travellers living in mobile homes spend on average €108 per week on energy compared to the general population who spend €38.56 weekly.
- Travellers living in mobile homes spend on average 26.1% of their income on energy, and that this is around five to six times higher than the corresponding figure of 4.6% for the population as a whole.
- Travellers living in mobile homes or trailers are nine times more likely to go without heat than the general population.
- Travellers living in mobile homes are fourteen times more likely to be unable to keep their household warm than the general population.

National Traveller MABS recognises the importance of moving to cleaner energy sources and the need to regulate the use of solid fuels. However, we are concerned with the implications of such regulation on Travellers who rely on solid fuel as a source of heat. In order to facilitate the transition away from solid fuel Travellers will need access to affordable alternatives.

¹ Watson, D., Kenny, O., and McGinnity, F. (2017) A Social Portrait of Travellers in Ireland. Research Series 56, Dublin: Economic and Social Research Institute.

² Stamp, S. and Kearns, M. (2019). Accommodating Ethnicity; Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers, An Exploratory Study. Dublin: National Traveller MABS.

A note about this consultation process

The regulation of solid fuel will have implications for groups experiencing energy poverty most notably Traveller families particularly those living in mobile homes and trailers. It is important to note when undertaking consultations on important issues such as this, that the process enables access to and participation of vulnerable groups. A 2017 study by the ERSI found that 90% of Travellers living in mobile homes had no internet access. This creates a problem of access in terms of enabling participation of this group. We recommend that similar consultation processes engage with representative organisations of vulnerable groups to design mechanisms that facilitate the participation of those most affected by the policies being developed.

In this submission we have focused on two questions contained in your consultation questionnaire (available on your website):

- How can a transition to less polluting fuels and more efficient heating systems be supported?
- Are there particular challenges in terms of the enforcement of regulations applying to solid fuel burning, and how might these be best addressed?

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

While it is important that Ireland meets its commitment under the Climate Action plan, it is important that vulnerable communities experiencing energy poverty should be supported in the transition to cleaner and affordable energy. In the case of Travellers, we propose:

- The provision of energy efficient mobile homes BS 3632:2105 under caravan rental/loan schemes through local authority run schemes.
- That Traveller specific accommodation is prioritized in the state's retrofitting programmes

Residential Standard Mobile Homes/Trailers

The provision of affordable energy efficient mobile homes will reduce dependence on solid fuel. Our 2019 study recommends that families living in mobile home accommodation should be facilitated to access residential standard mobile homes to address the problem of energy poverty. This can be achieved by ensuring that Caravan Loan/Rental Schemes provide access to mobile homes and trailers that carry the British Standard BS 3632: 2015.

Prioritisation of Traveller specific accommodation in government supported retrofitting programmes of social housing

While our energy poverty study shows that Travellers living in mobile homes experience high levels of energy poverty, it is also apparent that there are issues of energy efficiency with 'day units' on halting sites as well as standard built homes on group housing schemes. We welcome the Programme for Government's commitment to increase targets for retro-fitting social housing under their Communities Scheme and the commitment to target vulnerable people experiencing energy poverty under the Better Homes Programme. Given the well documented chronic health issues and shorter life expectancy of Travellers, coupled with the issue of energy poverty, we propose that

Traveller specific accommodation be prioritized under these programmes. This will involve local authorities being directed to prioritize Traveller specific accommodation as part of their planned retro-fitting programmes.

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

In our experience Travellers who rely on solid fuels to heat their homes do so because there is no available affordable alternative. In the case of mobile homes, most families live in homes that are at least 10 years old or more (the average is around 15 years).³ These homes are energy inefficient and families use many sources of fuel to keep their home warm, including solid fuel. This arises out of necessity rather than choice. It is important that families are not penalised for using solid fuel if they have not been provided with retrofitting of their home or alternative clean fuel choices. Any regulations must provide for these exceptions until such a time that all families have been provided with energy efficient homes and can avail of cleaner fuels.

***It should be noted that this submission has the support of the Irish Traveller Movement.**

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³ Stamp, S. and Kearns, M. (2019). Accommodating Ethnicity; Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers, An Exploratory Study. Dublin: National Traveller MABS.