

Response to the public consultation on Ireland's Social Climate Plan (SCP)

Feminist Communities for Climate Justice

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This submission has been prepared by *Feminist Communities for Climate Justice*, a joint project between the National Women's Council of Ireland and Community Work Ireland.

National Women's Council

The National Women's Council of Ireland (NWC) are the leading national representative organisation for women and women's groups in Ireland, founded in 1973. With nearly 200 members, the ambition of the National Women's Council is an Ireland where every woman enjoys true equality and no woman is left behind. NWC's current Strategic Plan No Woman Left Behind prioritises the need for NWC to bring a new focus on the climate crisis, its impact on women, the need for a Just Transition and the need for women and women's organisations to play a more central role in development of policies and solutions to meet the challenge of our climate crisis.

Community Work Ireland

Established in 1981 as the Community Workers Co-operative, Community Work Ireland (CWI) is a national organisation that promotes and supports community work as a means of addressing poverty, social exclusion and inequality and promoting human rights. CWI has a membership base of almost 900 community workers and community work organisations working with the most marginalised communities throughout the country. CWI has been involved in the area of climate justice since 2010.

Feminist Communities for Climate Justice

Feminist Communities for Climate Justice campaigns for climate justice that reflects feminist and community work values. We mobilise communities, ensuring social inclusion and equality are central to climate policies and programmes. This partnership between the National Women's Council (NWC) and Community Work Ireland (CWI) amplifies the voices of women and marginalised communities that are most impacted by climate change, building momentum in communities to engage, understand and influence climate policies. Feminist Communities for Climate Justice will develop a feminist and community work analysis, has delivered an accredited training programme in partnership with the Department of Applied Social Studies at Maynooth University, has established a Feminist Communities for Climate Justice National Network, and has developed resources and campaigns around feminist climate justice including two toolkits.

1. Structural solutions over temporary Relief

The Social Climate Plan (SCP) must prioritise lasting, structural measures to effectively break the cycle of fossil fuel dependency and poverty, moving beyond short-term financial compensation.¹ The Fund should go beyond mitigating the social impacts of the new Emissions Trading System for buildings and road transport and aim to end energy and mobility poverty.² Given that revenues from ETS2 will peak by 2035 if not sooner, there is a finite once-in-a-generation opportunity to maximise the benefit of these funds to reduce fossil fuel dependency.

In the meantime, it is essential to prevent and counter the unequal impacts of rising carbon taxation. As the SCP must comply with the Do No Significant Harm (DNSH) principle, it must fully exclude investments that prolong the use of fossil fuels, and in particular, it should reduce reliance on gas for heating.³ We note that while gas is not prohibited by the EU's taxonomy regulation, it is classified as a strictly transitional fuel and therefore no financing under the SCP should include the potential for further gas lock-in via boiler replacements or new pipelines/connections.⁴

The Fund is an opportunity to leverage additional finance to transform the energy system and accelerate the energy transition, not merely delay inevitable costs. Indeed, this is the acknowledged purpose of the SCF.⁵ It is widely acknowledged however that carbon/energy taxation can be regressive. One way to mitigate that impact is to ensure that all ETS2 revenues (and their equivalent in existing national fiscal instruments) revenues are recycled to benefit the poorest 50% of households – which could be through targeted structural investments – to ensure a clearly progressive impact.⁶

Both public and private finance must be leveraged to enable the low-carbon transition of Irish energy and transport infrastructure. Changes in political priorities and fluctuations in Irish and European economies created by threats of tariffs leave businesses and industry that were previously invested in the green transition facing uncertainty. The Social Climate Fund (SCF) can be used to create security for these businesses and industry to continue pursuing

¹<https://caneurope.org/guiding-principles-for-social-climate-fund>

²<https://www.wwf.mg/?6937841/Implementing-a-Social-Climate-Fund-that-works-for-the-people-and-the-planet>

³ Art. 7 of the SCP Regulation: The Fund shall only support measures and investments which comply with the principle of 'do no significant harm' within the meaning of Article 17 of Regulation (EU) 2020/852.

⁴ The legal basis for including gas is Article 10(2) of the original Taxonomy Regulation, which allows for activities for which there are "no technologically and economically feasible low-carbon alternatives" to be deemed a substantial contribution to climate change mitigation under certain strict conditions. The specific activities and criteria for natural gas are detailed in Annex I of Delegated Regulation (EU) 2021/2139 (the main Climate Delegated Act), which was amended by the Complementary Climate Delegated Act.

⁵ Recital 13 of the Social Climate Fund Regulation (EU) 2023/955

⁶https://ieep.eu/wp-content/uploads/2022/12/Can-polluter-pays-policies-in-buildings-and-transport-be-progressive_IEEP-2022.pdf



investment in initiatives which align with the Fund's goals of reducing transport and energy poverty. It is important that the initial investment created by the SCF is followed up by a stable policy and funding framework by Government to signal that investment in tackling the issues of energy poverty and transport poverty, as well as investing in the green transition of the Irish economy, is a long-term and secure commitment for businesses and industry to pursue.

In order to maximise both the equity and environmental benefits of these revenues, revenue recycling should be balanced across both direct income support measures for low-income and vulnerable households and structural investments, which should also be targeted explicitly to achieve progressive distributional impacts. Options for revenue recycling include:⁷

- Carbon dividends
- Energy/public transport vouchers
- Income/ labour tax cuts for lower income earners
- Direct payments should move dynamically with carbon prices and be index linked
- Funding towards capacity building for Renewable Energy Communities and Sustainable Energy Communities.

2. Decarbonisation in Buildings: Prioritising Deep Retrofits

Investments under the Social Climate Plan must focus on energy efficiency and the decarbonisation of heating in preference to direct income support. Heating and cooling buildings is a leading source of carbon emissions in Europe with around 38% of all final energy use consumed for this purpose. And while incomes have stagnated, average rent has risen by 19% and housing prices by 47% over the past decade. In Ireland, average private rents rose by approximately 84% between 2012 and 2021, while disposable income rose by about 8% during the same period. This has led to a significant drop in housing affordability amongst low and middle-income earners, in addition to the shortage of housing supply.⁸

This results in a widespread housing crisis, characterised by unaffordable housing and energy bills for at least 29% of households, as well as insecurity of tenure, derelict housing, and disempowerment when it comes to making choices about renovations and energy provision.⁹ Renovating worst-performing homes and providing affordable social housing equipped with renewable energy are therefore key solutions to address both the climate and cost of living crisis at the same time.

⁷ https://ieep.eu/wp-content/uploads/2022/12/Can-polluter-pays-policies-in-buildings-and-transport-be-progressive_IEEP-2022.pdf

⁸ https://www.ictu.ie/sites/default/files/legacy/pdf/housing_costs_too_high.pdf

⁹ Waldron, R., Sugrue, S., Simcock, N. and Holloway, L., 2025. Precarious lives: Exploring the intersection of insecure housing and energy conditions in Ireland. *Energy Research & Social Science*, 121, p.103992.

- **Prioritise and rapidly expand access to deep retrofits:** Prioritise deep retrofits and renewable energy upgrades in social housing and the worst-performing buildings.

***Case study: New Green Savings Support Programme, Czechia** which has been adjusted to make access to the subsidies easier and more flexible. The programme provides support for partial or combined measures (including insulation, replacement of non-ecological heating, installation of photovoltaics, efficient water heating, recuperation, or building green roofs, rain or grey water management, charging stations for electric vehicles). Changes were introduced in 2025 to include a bonus for dependent children, along with simplified application procedures. Lower income households may avail of subsidies up to 95% of the total cost, and partial measures such as windows and door replacement can be funded.¹⁰*

***Case study: Ma Prime Renov, France.** Since September 30, 2025, only people with very low incomes who have a home classified E, F or G on the energy performance rating are eligible for funding under this programme. The number of applications accepted is limited to 13,000 until the end of 2025. This is a good example of targeted subsidies for households in poor quality housing with low incomes.¹¹*

- **Equity for Low-Income Households:** Expand free retrofit access for all low-income households beyond current eligibility, by developing novel financial instruments such as green mortgages, low- or zero-interest loans, bridging loans and expanded subsidies. The local authority and social housing sector should be prioritised for retrofitting by 2030.
- **Tenant Protection:** Target retrofits in the private rental sector for vulnerable tenants (e.g., HAP recipients) to ensure equitable access. Safeguards must be in place to prevent tenant displacement and unaffordable rent increases post-renovation (anti-renoviction measures).
- **Energy efficiency in the private rental sector:** Minimum Building Energy Ratings (BER) must be implemented in the private rental sector, where a fifth of the Irish population in total are housed. Private landlords play a large role in housing provision in Ireland and therefore must play a role in the upgrading of Ireland's housing stock, which is amongst the least energy efficient in Europe. Bespoke instruments should be trialled for this sector to find out what is the most effective way to incentive upgrades of poor-quality rental accommodation. One important measure which could be promoted further

¹⁰ <https://www.lifebrick.cz/en/news/easier-and-more-accessible-use-of-subsidies-in-2025/>

¹¹ <https://www.service-public.gouv.fr/particuliers/vosdroits/F35083>



is the use of external insulation which does not (usually) entail disruption to the residents of the accommodation, which means it could be a game-changer for the rental sector.¹² The planning guidance on material changes to the appearance of a non-protected structure should be significantly relaxed to ensure that no barriers are put in the way of property owners seeking to externally insulate buildings that are not protected structures or in a conservation area.

- **Measures for multi-use dwellings such as apartments:** apartment dwellers often experience difficulty making even modest energy efficiency improvements to their homes due to complex governance and management structures. The government should introduce revisions to the legislation/ regulations to facilitate changes to governance structures of jointly owned apartment buildings that allow for energy efficiency improvements to be accelerated.
- **Targeted Measures for the Traveller Community:** Members of the Traveller community spend between 26–28% of their disposable income on energy, placing them at high-risk of experiencing energy poverty. SCF funding should be ring-fenced for tailored energy-efficiency and retrofit schemes for Traveller-specific and private rented accommodation. Grants for retrofitting trailers and mobile homes, or to aid the purchase of more energy efficient mobile homes, should be introduced - there are international industry standards which could be used to specify the energy efficiency status of mobile homes suitable for year round living (i.e. the British standard BS 3632), but the cost of such units (€60,000 or greater) is prohibitive to most Travellers in acquiring them.
- **Community Support:** Fund the establishment of independent Community Energy Advice Services and local implementation capacity (one-stop-shop model) to provide tailored guidance and increase the uptake of measures. Support for community-based cooperatives.
- **Enabling small-scale/local access to renewables/renewable installation:** Enabling pockets of access to renewables and renewable installation over access-at-scale approach. Local Area Development Plans and local authority climate action plans/ decarbonisation zone strategies must incorporate access to renewables; the Government must facilitate necessary changes to enable this at Local Authority level. Consultation with bodies such as SEAI to enable the installation of solar panels on Traveller halting sites and on community buildings.
- **Scale up/further resource existing initiatives:** The Warmer Homes Scheme is a positive initiative provided by the Government to alleviate energy poverty - however, a waiting time of more than two years for works to be completed hampers the ability of the scheme to provide assistance with the urgency it should. Sustainable Energy Communities could also benefit from additional resourcing in order to scale-up the important work they do on the ground with communities who trust them. SCP funds

¹² <https://www.igbc.ie/resources/external-wall-insulation-for-existing-homes/>



should be used to further resource existing initiatives that already address the issues of energy and transport poverty, or align with the aims of the SCP for other reasons.

Case Study: Traveller & Roma Communities and Energy Poverty

Members of the Traveller community [spend between 26–28% of their disposable income on energy](#), which is over six times the national average. [The National Traveller MABS “Mobile Homes and Energy Efficiency” Report \(2022\)](#) found that 96% of Traveller households living in mobile homes experience poor energy efficiency, with many relying on unsafe or inadequate heating systems. These conditions contribute to energy poverty and health risks. Travellers also face exclusion from retrofit supports despite exposure to energy poverty as many mobile homes are ineligible for SEAI or National Retrofit Plan schemes. The ‘[FRA Roma and Travellers in Six EU Member States Survey – Ireland](#)’ (2019) similarly found that 25% of Traveller households live in damp or deteriorating housing, and 73% report discrimination when trying to rent or buy accommodation. Submissions to multiple County Council Traveller Accommodation Plans have highlighted barriers to the installation of solar panels on Traveller halting sites, another obstacle to the community’s full and fair participation in the green energy transition.

Roma families face parallel challenges, including overcrowded and poorly insulated housing, limited access to affordable energy, and barriers to social protection.

With thanks to Pavee Point and the National Traveller Women’s Forum for this input.

3. Tackling Transport Poverty: Mobility-as-a-Service

Structural measures must address the root cause of transport poverty: the lack of viable, affordable, and accessible transport alternatives, particularly in car-dependent and spatially disadvantaged regions. Measures introduced under the SCP should also recognise the gendered nature of transport poverty, and facilitate input into route design, timetabling and accessibility from local communities and organisations representing women and disabled people.

- **Targeted Place-Based Interventions:** prioritise targeted measures in communities most affected by transport poverty, such as rural, island, and underserved areas.
- **Shared Mobility Pilots:** Invest in scalable models of shared, low-emission transport (e.g., electric car-sharing, on-demand minibuses, subsidised e-bike access) as structural



alternatives to private fossil-fuel vehicle ownership. While there are several pilots currently rolling out mobility hubs, there is no reason why these should not be installed in every town and village. The pace of delivery is currently just too slow and too unambitious.

- **Public Transport Focus:** Incentivise the use of affordable and accessible public transport and invest in the necessary supporting infrastructure.
- **Accessibility as a Right:** Ensure all measures are tied to improving access to employment, education, healthcare, and essential services for vulnerable groups.
- **Transitioning transport for the offshore islands:** Residents of Ireland's inhabited offshore islands rely on diesel powered ferries, planes, and cargo boats to get on and off the islands and for delivery of necessities such as shopping and medication. SCP funds should be used to pilot (to eventually roll out at required scale) transportation modes for the offshore islands with a reduced carbon footprint or - where possible - zero emissions modes. Battery powered ferries, for example, can be utilised for shorter trips and are already in use in Norway and Sweden.
- **Pilot/expand free public transport schemes:** Whilst free public transport throughout the country may not be economically feasible, the SCF could be used to expand free access to public transport for specific cohorts of the population - such as the existing Free Travel Scheme and children under the age of eight - to population groups deemed most at-risk of transport poverty. Free travel initiatives should also be considered in cases of emergency, such as those fleeing domestic and/or gender-based violence, where barriers to accessing transport can put individuals in danger. Northern Ireland offers free bus and rail travel to those who have refuge or emergency accommodation with Women's Aid NI or the NI Housing Executive.

Targeted free public transport schemes at a local level could help alleviate transport poverty in rural, island and underserved areas. Fourteen rural transit systems in the state of Washington in America adopted zero-fare policies - either on a permanent or pilot basis - in recent years to encourage ridership and address concerns around health, equity and sustainability. These policies were enabled by state investment, and the SCF could be used to pilot similar zero-fare schemes. Beyond addressing transport poverty, good public transport infrastructure is an important tool in tackling loneliness in rural areas, particularly for older people, which has detrimental impacts for physical and mental health. At a minimum, the fare reductions of recent years should be maintained and expanded further. Consideration should be given to the idea of a "climate ticket" or a monthly reduced fare to incentivise uptake of new Bus Connects routes.

Case Study: Ireland's Offshore Islands - Barriers to Transition

Living on Ireland's offshore islands raises unique challenges in the face of the net-zero transition. The National Development Plan (NDP) 2021-2030 recognises that good transport services and a developed infrastructure are important prerequisites for maintaining island populations, with transport access for island populations impacting on every aspect of island life, including health and welfare services, education, employment, social and family life, and business. Islanders rely on diesel powered ferries, planes, and cargo boats to get on and off the islands and for delivery of necessities such as shopping and medication, which makes offsetting emissions challenging. A housing needs survey carried out by UCC¹³ also notes that retrofitting needs make up a sizeable percentage of property dissatisfaction leading to a higher likelihood of leaving the islands. Islanders must pay VAT and freight on top of every product brought into the island, making the cost of building a house three times that of the mainland. Many islanders want to retrofit their homes but it is difficult to attract contractors to work on homes on the offshore islands, particularly due to logistics and cost - including freight to bring products and vans across and accommodation for staff to stay overnight.

4. Accurately Identifying and Targeting Vulnerability

Effective resource use hinges on accurate targeting. The SCP must move beyond simple income metrics to implement a multidimensional, data-driven approach to identifying and locating vulnerable groups. A recent publication by the SEAI based on survey data from 2023 supports critiques of the 10% expenditure measure of energy poverty.¹⁴ The survey found that energy poverty was highly prevalent in Ireland throughout 2023, although estimates vary according to the measure used. On average across the year, two in five billpayers had difficulty paying their last bill, 23% had gone without heating in the preceding month, three in ten had cut back on essentials in the preceding month to afford heating, and 42% of participants spent 10% or more of their monthly income on energy costs.

The SEAI study found the significant minority spending 10% or more of their income on energy costs but not experiencing energy poverty according to any subjective measure suggests that the expenditure measure includes people who can comfortably spend a high proportion of their income on energy. This is further supported by the relationship between high energy expenditure and inefficient heating behaviour. Additionally, it found that the proportion of people under-consuming energy to the point their energy costs are below the 10% threshold, which

¹³ <https://cora.ucc.ie/bitstreams/2c164fb3-a03f-4bc1-9e90-a8638646d67c/download>

¹⁴ <https://www.seai.ie/sites/default/files/publications/bett-energy-poverty-in-ireland.pdf>



points to the fact that using the expenditure measure alone excludes people inadequately heating their homes to manage energy costs.

The SEAI report shows that the sociodemographic factors most strongly associated with being in energy poverty include lower income, being a renter and the presence of a disability in the household. Some of the characteristics associated with energy poverty change depending on the measure used. For example, families are more likely to have difficulty paying bills than single person households, but less likely to go without heating. Older people, a group typically thought to be at higher risk of energy poverty, were more likely to spend over 10% of their income on energy but were in fact less likely to be experiencing energy poverty according to the survey's subjective measures.

However, other researchers from the ESRI have also noted that the incidence of expenditure-based energy poverty is generally greater than self-reported energy deprivation, due to the high cost of electricity in Ireland, where retail electricity prices can be up to 3 times the cost of wholesale prices.¹⁵ Electricity expenditure drives fuel poverty status for many households, thus targeted measures to address energy poverty should specifically target the cost of electricity and ensure that the cost of electricity is reduced and/or mitigated for low-income and energy poor households. According to the ESRI study, a further 25% rise in energy prices would increase the share of households classified as energy-poor (including electricity) to 43% - this would be a national scandal for a wealthy country such as Ireland.

The study concludes that subjective reporting is an important way to measure energy poverty, and it specifically recommends the use of multiple measures to reduce the risk of excluding vulnerable groups and better capture the multidimensionality of energy poverty.

- **Inclusive Assessment:** Ensure the vulnerability assessment captures the complex realities shaped by intersecting factors, including housing conditions, rural isolation, age, disability, gender, and tenure status (e.g., renters, lone parents, Traveller and island communities)
- **Gender Mainstreaming:** Apply gender-disaggregated data to reflect the disproportionate impact of energy and transport poverty on women, such as older women living alone or single parents. Gender budgeting needs to be used in DCEE's outputs attached to the SCP - research conducted by the Parliamentary Budget Office earlier this year on Gender Budgeting in Ireland found that the then Department of

¹⁵<https://www.esri.ie/system/files/publications/RS144.pdf>

Environment, Climate and Communications used no gender equality metrics in its work.¹⁶

- **Collaboration:** Commit to actively partnering with local and marginalised communities to improve the accuracy and inclusivity of vulnerability mapping. A briefing by CAN-EU recommends the development of sectoral working groups and policy scenarios, highlighting the decarbonisation pathways with the most equitable social-economic-environmental benefits. A sectoral approach focusing on policy scenarios for different sectors (e.g., transport, renewable heating, energy efficiency) could generate important data and modelling, indicating what types of reforms and investments could produce the highest social and environmental impact.
- **Disaggregated Data:** The CSO should be mandated to collect and analyse disaggregated data on ethnicity, gender, disability, age and socio-economic status in relation to vulnerability to energy and transport poverty. Energy and transport providers do have existing databases that could be supported and further expanded to support the needs of vulnerable customers.
- **Energy users in arrears:** Ensuring the needs of customers who are most at risk of losing their electricity supply is an obligation of ESB Networks and Gas Networks Ireland. Vulnerable customers include those who need vital electrical medical equipment daily. It is essential that data from these bodies is used to inform policy and ensure that vulnerable customers are prioritised so that they can manage their bills without falling into arrears or experiencing supply interruptions.

Case Study: Older People & Energy Poverty

The Household Budget Survey shows that older people spend disproportionately more of their income on heat and light than many other groups. This is due to several factors:

- *Older people occupy the worst insulated homes.*
- *Many have medical conditions that make them more susceptible to the cold and as the body ages it is less able to retain heat.*
- *They spend more time at home than younger people.*
- *Some older people have medical and mobility devices that they need to power that are energy intensive.*

¹⁶https://data.oireachtas.ie/ie/oireachtas/parliamentaryBudgetOffice/2025/2025-06-12_gender-budgeting-in-ireland_en.pdf

While some reported going without heat, others made it plain that they were unable to do so. Many older people cited energy costs as their primary concern. Many had high bills due to storage heating installed by local councils. Others were angry about the cost of gas and the standing. They dreaded winter and adopted restrictive behaviours to minimise the cost of heat, such as limiting themselves to use of one room only.

Age Action has called for an Energy Guarantee to ensure that older persons can afford the minimum quantity of energy to meet their basic needs for heat and light.¹⁷

5. Linking Income Support to Long-Term Transition Pathways

The provision of temporary direct income supports such as cash payments or additional welfare benefits (limited to 37.5% of estimated costs) must be solely transitional and decrease over time as structural benefits materialise. On the other hand, there is a case to be made for returning carbon tax/ ETS2 revenues directly to citizens as a form of universal basic income and to demonstrate a commitment to energy justice.¹⁸

- **Clear Communication:** Payments - and bills - must be clearly communicated as a component of the national climate strategy (e.g., as a "Climate Bonus") to build public trust and support for carbon pricing mechanisms. The opportunity to communicate climate information and the co-benefits of climate action to tackle energy poverty and benefit public health and the environment should not be missed. The success of energy smart metering as an energy efficiency measure is highly contingent on a successful communication strategy. However, to date households that have smart meters are not uniformly on smart time-of-use tariffs, and information about real-time household energy consumption is not being effectively communicated. Households are generally required to set up a separate account with ESB networks to access their data - a cumbersome process. Unlike the UK, the CRU in Ireland did not require utilities to provide an in-home display to accompany smart meters, whose information is largely meaningless to householders.¹⁹

¹⁷ https://www.researchgate.net/publication/388484192_Spotlight_on_Income_in_Older_Ag

¹⁸ Energy justice mirrors the distributive and procedural justice demands of the environmental justice and climate justice movements and encompasses several goals including: transitioning the power and control over the means of energy production into the hands of the community, ensuring fair and equitable distribution of the benefits and burdens of energy production activities, and centring the concerns of marginalised communities.

<https://iejusa.org/workbook/>

¹⁹ <https://www.smartenergygb.org/about-smart-meters/about-the-in-home-display>



- **Tackle Split Incentives:** Financial supports for small property owners/landlords with tenants in-situ should be provided to further incentivise retrofitting of their properties. These supports should be conditional on the property being retrofitted to a specified minimum BER rating and protections for the tenant in-situ, particularly from rent increases or eviction after renovations have taken place.
- **Don't cut indirect taxes further:** the ESRI study notes that cutting indirect taxes in response to high energy prices is a poorly targeted response given that most of the revenue is spent compensating high income households who have been least affected. They point out that increases to welfare payments and the fuel allowance are a better way to target households vulnerable to energy price inflation, as well as to incentivise investment in energy-saving technology and behaviour.

6. Prioritise the development of an updated Energy Poverty Action Plan (EPAP)

The effective implementation of the SCP is fundamentally challenged by the lack of an operational Energy Poverty Action Plan (EPAP). The SCF Regulation makes over forty explicit references to "energy poverty" and it is vital that the SCP addresses the issue directly.

- **Policy/Definition Deficit:** The focus on an *Energy Affordability Task Force* instead of an EPAP risks addressing symptoms over structural vulnerabilities, making it challenging to produce an SCP consistent with EU law and lacking the necessary data and analysis for expenditure justification. Additionally, Ireland's existing measurement and definition of energy poverty is lacking, an issue which was identified by the ESRI in EPAP.²⁰ The extent to which a household is experiencing energy poverty is unknown using current measurements, as well as who truly benefits from policies intended to alleviate it. Establishing a new robust definition to tackle this issue using SCP funding will be important to ensuring proposed targeted supports reach those most in need of them.
- **Policy Alignment:** The SCP must ensure alignment with the principles of the European Pillar of Social Rights (EPSR) and feed into the forthcoming National Building Renovation Plan, ensuring coherence across Ireland's social and climate objectives.
- **Additional Financing:** The SCP must be underpinned by a clear national co-financing commitment beyond the mandatory 25% minimum to maximize impact and ensure scalability. Provision for the co-financing element should be made in additional resources to DCEE in the 2026 Budget.

²⁰ <https://assets.gov.ie/static/documents/energy-poverty-action-plan-2022.pdf>

7. Resourcing Community Initiatives that Align with the Social Climate Fund

Community initiatives exist on the ground in Ireland working to address the issues of energy and transport poverty in their localities. Retaining staff and funding are challenges to the continuation of this valuable work; the SCP can be used to better resource existing initiatives which align with the Fund's goals.

- **Sustainable Energy Communities** - Government has created infrastructure but it is under-resourced.²¹ A recent report by NESC highlights the challenges facing communities that want to participate in the energy transition. It notes that activating community energy and renewable energy community schemes is almost undoable under the current regimes. The report includes a series of recommendations that should be considered to widen participation in renewable energy and generate community benefits.

Figure 7.1: Five Areas to Further Enable Energy Communities



- **Invest in social enterprise:** Social employment schemes to address shortages in energy poverty and transport poverty related industries (e.g. retrofiting) have potential to be scaled up into social enterprises. It is desirable to have community involved in creation of schemes and partners like Community Work Ireland to ensure that groups most at-risk of energy poverty for employment are targeted by measures e.g. in the Traveller community.
- **Sustainable funding:** Many climate action projects undertaken at a community level are underfunded, rely on volunteers or can only access project-related funding instead of core funding for staffing. It is vital that the Government recommits funding in 2026 to the

²¹ <https://www.nesc.ie/publications/energy-communities-in-ireland-progress-challenges-and-potential/>

Community Climate Action Programme and provides adequate long-term funding for community climate action and community energy projects.