



YOU'RE NOT ALONE

ALONE Submission to
Ireland's Energy Efficiency Obligation Scheme
Department of Climate, Energy, and the Environment
July 2025



Questionnaire on the Energy Efficiency Obligation Scheme

1. Do you agree with the proposal that the EEOS moves from contributing 60% of the current EED target to 45% of the recast EED target?

- Yes
- No
- **Don't know/ No strong opinion ✓**

2. Are you in agreement with relaxing the 100 kWh/m²/year minimum uplift requirement for residential savings where the package of actions includes either a heat pump (HP) or external wall insulation (EWI), including where the package consists of one of these as a single action?

- Yes
- No
- **Don't know/ No strong opinion ✓**

3. Do you agree with the proposed changes to the conditions for achievements of credits under the energy poverty sub-target i.e. removing the D2 to B2 requirement and aligning energy poverty credit criteria with residential energy credit criteria such that there is instead a minimum uplift of 100 kWh/m²/year (with a derogation for packages with a heat pump or external wall insulation)? In this scenario the energy poverty ownership criteria would remain unchanged.

(Feedback from obligated parties and delivery under the EEOS has shown that energy poverty despite being the smallest part of the scheme has been the most difficult to deliver, in terms of finding sufficient eligible energy saving opportunities. It has been noted that the D2 to B2 minimum BER uplift has been cited as a barrier to achievement and in sourcing energy poor homes. We believe that matching the residential conditions i.e. requiring a minimum 100 kWh uplift with a derogation package including a heat pump or external wall insulation will remove this barrier and make delivery of this target easier for all obligated parties.)

We do not agree with the proposed change.

Energy poverty has a detrimental impact on the health of older people, exacerbating respiratory and cardiovascular conditions, incidence of stroke¹, and overall mortality and adverse health outcomes². ALONE is concerned that removing the D2 to B2 BER requirement will result in fewer grants going to energy poor homes.

According to the SEAI's annual report, **just one third of residential retrofitting grants went to energy-poor homes last year**. While this meets minimum requirements under the current Energy

¹ https://tilda.tcd.ie/publications/reports/pdf/Report_HousingConditions.pdf

² https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2022/2022-03-04_I-rs-note-energy-poverty-in-ireland_en.pdf

Efficiency Obligation Scheme, we believe that the targeting of energy poor homes could be significantly improved. CSO data indicates that 45% of homes in Ireland have a BER rating of D1 or lower, highlighting the scale of need.³

We are concerned that the proposed change effectively **lowers the ambition of energy poverty reduction efforts**. The minimum 100 kWh uplift proposed is a lower uplift requirement than a D2 to B2 minimum uplift, which is at minimum a 160 kWh uplift. Moreover, a 100 kWh uplift could be achieved where a B3 rated home is upgraded to an A1 rated home. We do not believe that this could be fairly described as supporting an energy poor home. **Lower-rated homes should be prioritised, particularly in the current context where there are substantial waiting lists for accessing retrofitting grants.**

Further, the minimum 100 kWh could result in lower-rated homes remaining energy poor even after undertaking a retrofit – a 100 kWh uplift to a G-rated home would still leave the home as E-rated.

Rather than the minimum BER uplift required, we believe that the main barrier to achievement of energy poverty targets is the complexity of the process for applying for grants, the administrative burden, and the long waiting lists associated with retrofitting. ESRI researchers have found that the lowest income households are more likely than most other income groups to struggle more with the complexity of the bureaucratic procedures, to report that the conditions under which the grants are offered do not suit them, and to see no benefit in retrofits recommended by the government⁴.

Additional research has found that *“the process for applying for grants and subsidies is highly administrative and typically assumes access to the internet accompanied with appropriate levels of digital literacy, which therefore excludes many individuals”*⁵. These challenges are likely to impact the ability and willingness of people living in energy-poor homes to apply for the grants, including the older people we work with in ALONE.

To achieve a Just Transition, we believe there should be better targeting of energy poor homes, and improved support for older people and other at-risk groups to access grants. This would better enable the State to reach residential energy credit criteria. It is vital that the steps we take to reduce our emissions are progressed in a way that is just, and includes households living in energy poverty.

4. Should all importers of aviation fuel be subject to the EEOS including those who import aviation fuel for their own use be obligated under primary legislation?

- Yes
- No
- **Don't know/ No strong opinion ✓**

³ <https://www.cso.ie/en/releasesandpublications/ep/p-dber/domesticbuildingenergyratingsquarter32024/>

⁴ https://www.esri.ie/system/files/publications/WP751_0.pdf

⁵ <https://publicpolicy.ie/environment/marginalised-experiences-in-irelands-energy-transition-moving-towards-a-just-and-inclusive-policy-agenda/>

5. Do you agree with the proposal to allow newly obligated parties under the EEOS to buy out up to 100% of their target in the first year of their obligation and 50% in the second year of their obligation?

- Yes
- No
- **Don't know/ No strong opinion ✓**