
Submission to the Consultation on the Revised Energy Poverty Action Plan

Feminist Communities for Climate Justice

May 2024



Rialtas
na hÉireann
Government
of Ireland

Tionscadal Éireann
Project Ireland
2040



This project is funded under the Community Climate Action Programme: Climate Education, Capacity Building and Learning by Doing (Strand 2), which is funded by the Government of Ireland through the Department of Environment Climate and Communications.



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, is delivering 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 will develop resources and campaigns around feminist climate justice.

Energy Poverty Action Plan

It is imperative that the revised Energy Poverty Action Plan (EPAP) acknowledges the gendered experience of energy poverty for women and girls in order to prevent gender inequality worsening in this area, as well as go beyond short-term fixes and prioritise addressing the structural issues which cause energy poverty to be experienced. Near and medium-term actions to address energy poverty and ensure an inclusive and just transition to a carbon neutral society must be made with attention to gender. The inaccuracy and inadequacy of Ireland’s expenditure-based method of measuring energy poverty should be addressed as a priority action, and units of measurement outside of the household should be explored. Additionally, a lack of disaggregated data to represent in detail the disproportionate impact of energy poverty experienced by marginalised communities in Ireland jeopardises the ability of Government to create evidence-based policies to ensure that these communities are not further left behind in attempts to fully eradicate energy poverty in Ireland.

Gender & Energy Poverty

Whilst the relationship between income and energy poverty is obvious and noted by Government in EPAP¹, groups in society who already suffer from identity-based disadvantage such as women, disabled people, migrants, people seeking refuge and asylum, Travellers and lone parents – the vast majority of whom are women – are also more susceptible to experiencing energy poverty². There are both physiological and sociocultural aspects to the gendered experience of energy poverty, with research noting gendered differences in thermoregulation. Women in all age groups are more likely to experience energy poverty due to their socioeconomic disadvantage compared to men, with lone parent households headed by a woman and older women particularly vulnerable³. Data from the Survey on Living and Income Conditions (SILC), when linked with findings from recent research conducted by The Housing Agency, shows that those most impacted by energy poverty are female lone parents renting private accommodation in Ireland⁴. Gendered income disadvantage leads to women living in poorer, energy inefficient housing and unable to afford or access technological or structural upgrades to improve the energy efficiency of their home. Tenure status is also a key factor, with a lack of minimum Building Energy Rating (BER) in the private rental sector, and Government admitting that there is little to no incentivisation for landlords to retrofit private rental properties for tenants⁵.

¹ Energy Poverty Action Plan 2022, p. 4 & 5

² Dukelow, F., Forde, C. and Busteed, E. (2024) [Feminist Climate Justice Report](#), p. 63

³ [EmpowerMed – Gender & Energy Poverty: Facts and Arguments](#)

⁴ Dukelow, F., Forde, C. and Busteed, E. (2024) [Feminist Climate Justice Report](#), p. 67

⁵ Climate Action Plan 2024, p. 232



The cultural and gendered associations that see women carrying out the majority of caring work also plays a role in gendered uses of energy and has implications for gendered vulnerability to energy poverty. Robinson⁶ notes that both exclusion from the economy and unpaid caring or domestic roles have impacts on energy use and vulnerability to energy poverty for women, connecting energy poverty to wider income and material poverty associated with gender inequality. Carrying out caring duties has an impact on energy use that is not accurately captured by household-level assessments of energy poverty – women who are in full-time employment and also carry out unpaid caring work in the home, a phenomenon which has been coined the ‘Second Shift’⁷, experience a time-squeeze which is linked to more intensive resource use including greater use of energy intense household appliances and pre-prepared food⁸. However, research also shows that women are more likely to influence behaviours and use of energy in the household, particularly behaviour that conserves energy use⁹.

Medium-term actions aiming to address energy poverty in EPAP must pay attention to issues of societal gender inequality in order to eradicate the issue of gendered energy poverty. An intersectional approach taking into account the needs of Traveller women, disabled women and women living in direct provision should be pursued in order to ensure that women in all of their diversity benefit from the eradication of energy poverty in Ireland.

Feminist Communities for Climate Justice recommends the following actions:

- 1. Develop a measurement for energy poverty that is not solely expenditure-based**
- 2. Collect more disaggregated data on women and other marginalised communities in relation to energy poverty**
- 3. Proof short- and medium-term actions in EPAP for their impact on women and other marginalised communities**
- 4. Include transport costs in measurements and definitions of energy poverty**
- 5. Introduce assessments of energy poverty on an individual basis alongside household assessments**

Develop a measurement for energy poverty that is not solely expenditure-based

EPAP itself notes that current expenditure-based methods of measuring energy poverty need to be improved, with research provided by the Economic and Social Research Institute (ESRI) noting that

⁶ Robinson, C. (2019) Energy poverty and gender in England: A spatial perspective. *Geoforum*, vol. 104, August 2019, pp. 222-233

⁷ Hochschild, A. (2012) *The Second Shift: Working Parents and the Revolution at Home*

⁸ Dukelow, F., Forde, C. and Busteed, E. (2024) *Feminist Climate Justice Report*, p. 52

⁹ Elkanat, A. and Gomez, J. D. (2015) “Energy Engenderment: An Industrialized Perspective Assessing the Importance of Engaging Women in Residential Energy Consumption Management”, *Energy Policy*, vol. 82, July 2015, pp. 166-177.

an improved method would allow for better assessment of the impact of these policies on levels of energy poverty, as well as who is benefitting from them¹⁰. Additionally, expenditure-based methods, which rely heavily on income to measure energy poverty, fail to capture gendered experiences in this area, particularly unpaid caring work in the home which creates energy use as discussed above. Gendered energy use for care work is also often shaped by context-specific gender dynamics rather than economic activity, which cannot be captured by measurements of energy poverty that rely solely on quantitative data¹¹. Expenditure-based methods, crucially, do not capture the intersecting inequalities and barriers to accessing energy that marginalised communities in Ireland are more exposed to. An intersectional approach is needed here to capture the differing and unique experiences an individual may face based on social positioning and identity.

Improvements in energy poverty measurements, including pursuing an intersectional or multidimensional approach, require more disaggregated data and to assess on an individual basis rather than a household basis. These two points will be elaborated on later in this submission.

Collect more disaggregated data on women and other marginalised communities in relation to energy poverty

Advice from ESRI research relayed in EPAP also notes a need to collect more data to better assist in identifying the severity of energy poverty¹². This lack of data also prevents full exploration of alternative measurements of energy poverty, such as the multidimensional approach¹³.

EPAP and expenditure-based methods of measurement result in a plan and definition of energy poverty that only identifies low-income households as those most at-risk of experiencing energy poverty, meaning that marginalised communities such as Travellers, disabled people and people living in direct provision are not identified as groups who are more vulnerable to energy poverty. It also fails to recognise the gendered experience of energy poverty elaborated above.

Better data collection, particularly disaggregated data, can help identify the gendered experience of energy poverty within an Irish context in addition to the barriers that marginalised communities experience in accessing energy. This data must go beyond quantitative forms and include a qualitative form of data beyond self-reporting, which is currently inadequate in assessing and measuring experiences of energy poverty. The European Economic and Social Committee (EESC) have recently commissioned research on the use of gender-disaggregated data on energy poverty, signalling that this is now an interest at the European level in climate and energy policy and

¹⁰ Energy Poverty Action Plan 2022, p. 38

¹¹ Dukelow, F., Forde, C. and Busteed, E. (2024) Feminist Climate Justice Report, pp. 62 & 63

¹² Energy Poverty Action Plan 2022, p. 38

¹³ Dukelow, F., Forde, C. and Busteed, E. (2024) Feminist Climate Justice Report, pp. 62

concerns¹⁴ – there is opportunity for Ireland to be a leading example in this area as a member state of the European Union (EU) by pursuing disaggregated data and its use in EPAP.

Policy decisions in energy poverty can be enriched with this evidence informing their creation, allowing actions to tackle energy poverty to reach target communities in most need of assistance and support outside of income-based disadvantage.

Proof short- and medium-term actions in EPAP for their impact on women and other marginalised communities

Women and a number of other marginalised groups such as Travellers, disabled people and people living in direct provision are more vulnerable to energy poverty and face other barriers to participation in social, economic and political life. Policy decisions which do not pay attention to existing inequalities and social exclusion for these groups risk exacerbating those inequalities.

All short- and medium-term actions in EPAP should be proofed with relevant policy proofing tools to ensure that actions taken to eradicate energy poverty do not exacerbate existing gender and other inequalities.

Include transport costs in measurements and definitions of energy poverty

Current measurements, definitions and actions to tackle energy poverty within EPAP do not include the scope of energy used in transport for households or individuals. The issues of energy poverty and transport poverty – concerning access and affordability of public and private transport – have largely been seen as separate areas. However, policy makers and academics have recently seen the overlaps between energy use in transport and energy use in the home¹⁵¹⁶. These overlaps become more pressing in the face of plans to electrify household energy sources and private transport through the encouraged adoption of electric vehicle (EV) use by the public from Government.

Overlaps are also relevant now, when fossil and solid fuels still power a large amount of households and private vehicles in the country, both of which are subject to increasing rates of carbon taxation. Transport is the second-largest household expenditure item in the EU, with Irish households spending an average of 9.9% of their expenditure on transport in 2021¹⁷. There are also concerns in relation to gender equality in this area, with the majority of Irish women considering car ownership

¹⁴ Habersbrunner et al (2024) [Study on gender-disaggregated data on energy poverty for The European Economic and Social Committee](#)

¹⁵ Dingley, O. (2023) [Addressing Energy Poverty in Ireland](#), PublicPolicy

¹⁶ Sidortsov, R. and McCauley, D., 2023. Energy Justice. In: J. Ohlsson, and S. Przybylinski (eds) Theorising justice. Bristol: Bristol University Press, pp.171-190.

¹⁷ Statista - [Transport as a percentage of final consumption of households in the European Union in 2021, by country](#)



as a necessity – inclusive of the costs associated with it – to carrying out caring roles and to alleviate safety concerns associated with public transport use¹⁸.

Cross-departmental work should take place to include transport energy costs within definitions and measurements of energy poverty – the overlaps, particularly both using the same energy sources presently and in the future through mass electrification, have ramifications for revealing and ultimately assisting individuals and households living with a form of energy poverty that has not been recognised by Government yet.

Introduce assessments of energy poverty on an individual basis alongside household assessments

Gendered experiences of energy poverty, as discussed above, are obscured by measurements of energy poverty which take the household and its income as the unit of measurement, particularly the unpaid care work that is largely the responsibility of women. Household-based measurements also obscure energy costs associated with transport, an issue which has already been elaborated on within this submission¹⁹. There is a double-disadvantage created here for women carrying out caring work with household-based measurements of energy poverty – they do not capture the unpaid caring work that they carry out, nor the transportation costs associated with that caring work which makes car ownership a necessity.

Household-based measurements cannot accurately capture individual vulnerabilities within a household, nor differences in energy use related to these vulnerabilities – one example being energy use associated with some disabilities or chronic health conditions requiring the use of medical equipment, mobility devices, and temperature regulation. Disabled people are higher users of energy on average, and the percentage of disabled people who cannot work has increased from 8.5% in 2020 to 19.6% in 2022 in Ireland²⁰.

This unit of measurement also cannot capture the experiences of those in emergency accommodation, direct provision, or who are living in institutions. Information on the energy use of those living outside of household structures is virtually unknown in an Irish context, and they have little to no ability to choose their energy supplier. Women are overrepresented in the numbers of lone parent households living in emergency accommodation²¹, adding another gendered concern to the current household-based unit of measurement and underlining the vulnerability of lone parent households headed by women to energy poverty.

¹⁸ Transport Infrastructure Ireland – [Travelling in a Woman's Shoes report](#)

¹⁹ Dukelow, F., Forde, C. and Busteed, E. (2024) Feminist Climate Justice Report, pp. 62 & 63

²⁰ Disability Federation of Ireland – [Government urged to take decisive action to tackle energy poverty](#)

²¹ Dukelow, F., Forde, C. and Busteed, E. (2024) Feminist Climate Justice Report, p. 67



If EPAP aims to ensure an inclusive and just transition to a carbon neutral society, then it must take into account the experiences of individuals and those living outside of household structures. Some of Ireland's most disadvantaged and marginalised groups exist outside of traditional measurements for energy poverty – there can be no just transition or eradication of energy poverty which does not account for the experiences of groups who are most vulnerable to its impacts.