Q1 Do you agree with the Scottish Government’s proposal to provide for a statutory target to reduce fuel poverty to no more than 5 per cent of Scottish Households by 2040.

1.1 COSLA welcomes the commitment the Scottish Government has made to reduce fuel poverty to no more than 5 per cent of Scottish Households by 2040. Local government recognises that eradicating fuel poverty is a priority, and if achieved, it will also contribute to tackling many associated inequalities.

1.2 We are generally content with the statutory target. We recognise that having a statutory goal with a clear reporting structure sends a clear and consistent message across Scotland around the importance placed on tackling inequalities experienced by those living in fuel poverty.

1.3 Whilst there is concern that the long-term nature of the target might lead to a loss of momentum to achieve the proposed outcomes, COSLA recognises the effectiveness of the proposed sub-target levels and interim timeframes in assessing progress towards eradicating fuel poverty. We believe they are ambitious, yet realistic and achievable.

1.4 As highlighted in our original consultation submission, we would also welcome further discussion to ensure that the definition and target adequately acknowledge and address the challenges for those living in remote, rural and island communities.

Q2 Do you agree with the Scottish Government’s proposal for a revised definition of fuel poverty?

2.1 COSLA is generally supportive of the revised definition of fuel poverty. We welcome the income threshold based on 90% of the UK Minimum Income Standards (MIS) and that the 10% fuel cost to income ratio is based on an After Housing Costs (AHC) basis.

COSLA appreciates that the new definition will capture many more households struggling to afford required fuel costs once they have paid their rent or mortgage, but this will provide a more accurate estimate of fuel poor
households and those at risk. We are also content that childcare costs are deducted from the MIS total and that this will provide a better idea of the residual household income.

2.2 Whilst generally content with the changes, COSLA would welcome early collaborative work on the impact of the changes on current formulas of distribution for associated funding.

2.3 On the Scottish Government decision not to mark the UK MIS up for remote, rural and island households as recommended by the Scottish Fuel Poverty Definition Review Panel, we have reservations over how the strategy will recognise and address the higher living and fuel costs for these communities without adjustments to the MIS. We understand Scottish Government’s position that upward adjustments to living costs are unusual for non-urban areas. However, these have been implemented before in the Scottish public sector.

Our concerns are echoed by councils and local partners in these communities and COSLA would welcome further Scottish Government engagement with them to ensure the strategy is truly inclusive and reflective of our communities’ diverse needs.

2.4 Clarity and further evidence would be welcome on the proposal to use 75 years of age as the chosen criteria to identify those who are likely to experience adverse health outcomes. There are considerable variations in life expectancy and good health across Scotland. COSLA is aware that further criteria might complicate calculations. However, we would welcome a more nuanced threshold for those vulnerable to health risks linked to fuel poverty and further work to develop a more specific list of health and disability categories. Ideally this should be with the input of councils and partners in rural, remote and island communities.

Q3 Do you agree with provisions in the Bill requiring the Scottish Government to publish a fuel poverty strategy? Do you also agree with the consultation requirements set out in relation to the strategy?

3.1 COSLA is broadly content with the provision requiring the Scottish Government to publish a fuel poverty strategy with interim targets, and the duty the Bill places on Scottish Ministers to work collaboratively with organisations and stakeholders to ensure the 2040 target is met. We are also supportive of the consultation requirements linked to the strategy, and the importance they place on collaborative working with those who have relevant experience of living in fuel poverty or supporting fuel poor households.

3.2 COSLA invites the Scottish Government to work in partnership with local authorities, private providers, the third sector, colleges and businesses – especially across rural and island regions – on the outcomes and resources needed to implement the strategy. Local partners are also best placed to champion the benefits of mitigating fuel poverty, and to ensure their communities engage with what is on offer.
Q4 A draft fuel poverty strategy was published alongside the Bill on 27 June. Do you have any views on the extent to which the measures set out in the draft Fuel Poverty Strategy for Scotland 2018 will contribute to meeting the Government’s new strategy? Have lessons been learned from previous initiatives?

4.1 COSLA is generally supportive of the measures set out in the draft Strategy and is pleased to note the outcome-focused and collaborative nature of the Strategy.

We welcome the Strategy’s commitment to improving energy efficiency through the Energy Efficient Scotland programme and increasing access to affordable energy.

We are also pleased to note that the Scottish Government will work with local authorities to deliver area-based schemes for householders and provide support throughout the process, from initial advice to installation of measures. COSLA strongly supports the need for locally-based and adequately funded face-to-face advocacy services to help householders understand and engage with the changes/interventions needed to improve their household’s energy efficiency.

Given their lead role in Community Planning Partnerships, local authorities are best placed to design these services and ensure they integrate with existing ones.

4.2 COSLA would also urge the Scottish Government to make services/measures set out in the Strategy especially available and tailored to vulnerable householders, through locally planned and delivered face-to-face services provided at home or in places visited by these groups.

4.3 As part of the strategy and its measures, we recommend undertaking a comprehensive island proving exercise, including but not limited to: impact assessment on resources of the proposed definition and resultant fuel poverty levels across island communities; assessment of the infrastructure and context of each community in relation to the strategy; costs of fuel and use of fuel; alternative mitigation (cold weather payment/ winter fuel payment).

Q5 Do you have any views on the Scottish Government’s reporting requirements to the Scottish Parliament as set out in the Bill?

We are generally content with the reporting requirements to the Scottish Parliament and how the Scottish Government will be held accountable for its progress on the strategy. Having clear interim targets and reporting duties sends a clear signal of the importance placed on the agenda and on tackling inequalities experienced by those living in fuel poverty.
6. Summary

6.1 In summary, local government in Scotland remains supportive of the Scottish Government’s ambition to eradicate fuel poverty and the 5% target set for 2040. We are broadly content with the new definition of fuel poverty, the statutory targets it enshrines and the use of the After Housing Costs and the UK Minimum Income Standards to better estimate those at risk and target resources.

We also note the collaborative approach to implementing the measures in the strategy and the recognition of the key role local government plays in the provision of local services to support householders with energy efficiency.