1. 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.

Yes, I agree with this target. It is ambitious to go from the current level of 26% fuel poverty to less than 5% in the period intended, but without an ambitious statutory target there will be insufficient pressure to drive innovative actions on multiple fronts. Fuel poverty is an issue that hits at the poorest sections of society and creates multiple negative consequences; it is therefore absolutely right that it is a priority for Scottish Government, and positive results will benefit all society.

2. Do you agree with the Scottish Government’s proposals for a revised definition of fuel poverty?

The proposal for the new definition seems generally reasonable. However, while I recognise it is important to set clear directions by which the definition is applied, I would be concerned that parts 2-6 of Section 2 may be applied too narrowly, resulting in some households that would logically be defined as in fuel poverty not qualifying due to a particular circumstance. So, while the definition may enable greatest focus on those generally in greatest need, measures should be put in place to ensure it does not preclude assistance being given to those that need.

3. 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?

Yes, this gives clear direction on the timescales and framework for the strategy. It is right that the strategy consultation should be required to take note of those who have experienced fuel poverty as they can include sections of society that may have previously been less engaged in such processes despite their relevant experiences.

4. 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 target? Have lessons been learned from previous initiatives?

The draft Strategy is commendable in its comprehensiveness. There is potential though that there is an over-reliance on partner organisations and councils to help deliver the desired outcomes. The Strategy should be explicitly open to opportunities presented by the private sector.

The energy industry is in a period of rapid change which is creating catalysts for innovation – much of which could either be adapted to help address fuel poverty, or
has fuel poverty at its heart. Explicit direction in the Strategy that Scottish Government and or its partner organisations should use appropriate means to explore and support innovations that can address fuel poverty will ensure potential low cost solutions will be identified and tested. Without all measures being explored the delivery of the Strategy will not be as efficient as it could be and inevitably fuel poor households will have suboptimal solutions available to them.

There is wide recognition that fuel poverty is a difficult issue to resolve, therefore Scottish Government and its partners must be open to all opportunities to address it.

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

The reporting requirements seem appropriate.