We are responding as a group of islanders from Jura with extensive experience of working on community development on the island in both paid and voluntary capacities, including community action planning; community asset development; and energy efficiency and renewable energy projects.

Between us we have over 30 years’ experience of working with the community to understand their needs and the challenges of island life, and proactively using this feedback to respond to changes, challenges and opportunities in order to create a sustainable future for the island.

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.**

No – not without effective measures in the bill to counteract the challenges of ensuring ‘hard to reach’ households, including those on remote islands.

Whilst it is important to have a statutory target, we believe that it is likely that a high proportion of the 5% of households which will remain in fuel poverty if this target is met will be ‘hard to reach’ households.

These may be households which are:

- On islands or in geographically remote areas – serving these areas requires a larger investment of time and money meaning that approved contractors or organisations tasked with carrying out work are more reluctant to travel when there is plenty of opportunity to fulfil the quota on their own doorstep.
- Houses which are of non-standard tenure – for example tied houses and privately rented estate houses where showing the true cost of fuel is difficult or where there are barriers to making effective change such as lack of incentives to landlords;
- Houses of non-standard design, for example those which are hard to insulate using the standard measures provided for under previous national schemes.

Such households are likely to have already fallen through the gaps of many other ‘nationally available’ initiatives due to the fact that they are not easy to serve. Many ‘hard to reach’ homes will fall into more than one of the categories above.
Whilst the Draft Fuel Poverty Strategy does acknowledge differences in heating costs in islands and remote areas, there is no recognition of, or attempt to tackle, the fact that island homes are more likely than most to fall into the ‘hard to reach’ category. Therefore, we do not believe that this target is ‘island proofed’ as required by the Islands (Scotland) Act 2018.

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

Given the regional variations in fuel costs (including variation in the unit price of electricity and the higher price of oil in remote areas) we believe it is important that the cost of fuel is based on up-to-date local supply data as opposed to national or regional averages. For example, in order to ensure action is ‘island proofed’, it would not be enough to use the average cost of oil or wood on Islay and Jura as a benchmark for fuel costs in this area due to the additional costs incurred in transporting it to Jura.

We note from the 2016 ‘A Minimum Income Standard for Remote Rural Scotland’ report that living costs in rural areas are such that 10-40% higher incomes are required to achieve the UK average Minimum Income Standard level. We also note, from the 2016 report, that by using the UK average MIS data, the new definition would see fuel poverty rates in rural areas fall from 34.9% to 20.3% - below the urban rural poverty rate and below the national average.

We therefore echo the concerns noted by the recent consultation that the Scottish Government does not propose to follow the Definition Review Panel’s recommendations to adjust the UK MIS threshold upward for households living in remote rural areas and agree that, in seeking to adopt a ‘one-size-fits-all’ solution, the proposed approach will obscure or confuse the extent of fuel poverty in rural areas.

Whilst we welcome the attempt to combine data on fuel poverty and low income to target households most in need, it is not clear what measures will be taken to identify and assist those who currently do not heat their homes to an acceptable standard as this would cost more than 10% of their income (i.e. they choose to be cold rather than to be in fuel poverty).

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?

NO RESPONSE.
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?

NO RESPONSE.

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

We believe that the proposal for two non-statutory interim targets and milestones at 2030 and 2040 are not sufficient to monitor the effectiveness of the strategy and suggest statutory interim targets at 2025, 2030 and 2032 in line with the recommendations from Energy Action Scotland.