LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE

FUEL POVERTY (TARGET, DEFINITION AND STRATEGY) (SCOTLAND) BILL CALL FOR VIEWS

SUBMISSION FROM SCOTTISH OLDER PEOPLE’S ASSEMBLY

The Scottish Older People’s Assembly (SOPA) appreciates the opportunity to comment on the Fuel Poverty (Target, Definition and Strategy) (Scotland) Bill as the prohibitive cost of heating regularly arises in our meetings with older people around the country and at our assemblies.

Scotland is a cold damp country for much of the year We therefore welcome any initiative aimed at addressing the consequences of that. Cold and damp are vital issues for older people. They are more susceptible to related illnesses and as they are less active, mostly retired, and at home throughout the whole day they therefore have to spend more on heating their homes. Energy Action Scotland¹ has reported that 787,000 households currently experience Fuel Poverty or extreme fuel poverty.

We believe there is an implicit correlation between that and the fact that 75% of all deaths in the winter months are people aged over 75 and that 35% of deaths are due to environmental related lung conditions like flu and pneumonia. The dilemma of ‘heat or eat’ is detrimental to health which ever one you choose.

It is stating the obvious to say that fuel poverty means not having enough to afford adequate heating. In a situation where the British state pension is pitched at below the national poverty line (and Minimum Income Standard) and the pension rises much more slowly than energy costs then it is hardly surprising that so many older people fall into the fuel poverty trap. We are aware that pensions and energy costs are not presently within the control of the Scottish Government, but nevertheless it is important that this basic point is flagged up and not lost.

We support, of course, the Scottish Government’s objective of eradicating fuel poverty in Scotland, but we are somewhat sceptical as to whether that can be realistically achieved just by improving the fuel efficiency of homes (welcome as that is) or by re-defining the definition of fuel poverty.

We have the following specific comments on the Bill:

Fuel poverty is affected by household income, the energy efficiency of homes, the price of domestic energy and the way energy is used in the home. The Scottish Government have varying levels of influence in these matters. Fuel price has been the most important determinant in influencing rates of fuel poverty over recent years. Most Government programmes have focused on increasing the energy efficiency of homes which is welcomed, but there is also a need for financial support to address rising fuel costs.

The general principle of ensuring that the definition of fuel poverty targets those most in need is supported and the extensive work and consultation involving expert groups to get to this point is recognised.

However, having considered the key points in the Briefing Paper (many of which are quite technical), the following points are highlighted in relation to the impact on Older People in particular:

- Generally the changes appear to be moving the focus **away from older people to include younger families and the working poor**. (P24 of the Briefing Paper\(^2\) shows that the number of people aged 75+ that are defined as ‘fuel poor’ **reduces from 165,000 under the current definition, to 90,000 under the new definition, a reduction of 54%**). Whilst we of course understand the need to target limited resources on those most in need, we are concerned that the changes will result in vulnerable older people ‘falling through the gaps’.
  
  - Older people can be proud and unwilling to ask for help, suffering the cold and making choices about whether to ‘heat or eat’ which is not acceptable.
  - Older people are also most at risk from during cold weather, last winter saw the death rate for over 65s in Scotland increase to the highest in western and southern Europe.
  - Research conducted by Age Scotland found that almost six in ten single pensioners and four in ten pensioner couples in Scotland struggle to pay fuel bills – with those in rural areas most affected. This results in poorly heated homes and older people becoming more at risk of illness. (TFN Oct 2018\(^3\)) (The results of the Age Scotland research appear to reflect the previous definition of fuel poverty (47.5% of +75 households) better than the new definition (26.0% of +75 households)).

- The definition considers “households that need to spend more than 10% of their after-housing cost income on heating and electricity in order to attain a healthy indoor environment that is commensurate with their vulnerability status” as fuel poor. How will people be **identified as fuel poor** if they currently avoid putting the heating on and sit in darkened rooms, meaning that they spend much less than 10% of income on heating as they simply do not have the money to pay for it? (see flowchart on p20 of Briefing Note). Absolute income is an important consideration as some people will be able to afford 10% of their income to be spent on fuel more than others.

- Raising the **age threshold** of those requiring ‘enhanced’ household temperatures from 60 years to 75 years may be appropriate for much of the country, recognising that people are living more healthily for longer, however in some parts of Scotland healthy life expectancy is much lower (eg men in Dundee have a healthy life expectancy of just 54.3 years (ONS 2017)).

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\(^3\) [http://thirdforcenews.org.uk/tfn-news/winter-deaths-increase-staggering-says-age-scotland](http://thirdforcenews.org.uk/tfn-news/winter-deaths-increase-staggering-says-age-scotland)
• What is possibly more important to older people is not how the definitions of fuel poverty are calculated, but how this impacts their eligibility for support. Many older people may be ‘asset rich but cash poor’ and how this is accounted for when judging eligibility for energy efficiency measures for their homes is key. Whilst perhaps not meeting the tighter definition of ‘fuel poor’, they may be unable to afford the significant expense of a new boiler for example, which it is recommended should be replaced every 10-15 years.

• Whilst tackling fuel poverty is an important objective for the government, prevention is key. We are concerned that there is a tightening focus on those in fuel poverty which could result in a reduction in support and assistance to older people at risk of becoming fuel poor. Again, the forthcoming strategy and guidance on how the changes will impact the advice, support and funding available is awaited.

• The issue of rurality is covered within the briefing. P24 shows the significant reduction in the number of rural households defined as fuel poor due to the change in definition (from 154,000 to 99,000). This is concerning given the cost of ‘off grid’ energy supplies for older households that have no choice in supply and face other challenges due to their remote and isolated location.

• The issue of behaviour change has not previously been a focus of Scottish Government action on fuel poverty. All elements need to be tackled if the ambition of eradicating fuel poverty is to be achieved. Education is key to behaviour change and significant creative thought is required on how information that will result in effective and lasting behaviour change is delivered.

• Awareness and information campaigns must not solely rely on the internet for delivery as this would miss many older people. The role of word of mouth and face to face delivery of information by trusted people should be central to any communication plan.

SOPA thanks the Local Government and Communities Committee for the opportunity to engage in the Fuel Poverty Bill process and looks forward to having further meaningful input once the strategy is available for consultation.