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CONSULTATION RESPONSE: DEVELOPMENT OF IRELAND'S SOCIAL CLIMATE PLAN

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This document is a [copy of the survey used for the public consultation](#) on the development of Ireland's Social Climate Plan. It outlines EJNI's response to the survey questions. For a full outline of EJNI's position on what needs to be in Ireland's Social Climate Plan, see our resource paper published earlier this year, [Six Priorities for Ireland's Social Climate Plan](#).

Development of Ireland's Social Climate Plan

Section A: Participant Information

Section B: Your Views on Making the EU Social Climate Fund work for Vulnerable Groups in Ireland

Part 1: Prioritising Vulnerable Groups

In this section we wish to know which vulnerable groups need to be prioritised in urban and rural areas. We also wish to know how you propose we should identify the vulnerable groups for targeted supports. Please suggest how vulnerable groups can be identified and targeted for support.

1. Quantify and identify vulnerability

Ireland's SCP must identify and quantify who is vulnerable (using multiple indicators) and explain the methodology used, with estimates of price effects on energy/transport poverty and small firms. This is an explicit obligation in [Article 6 and the SCP template in Annex V \(e.g., 6\(1\)\(d\)-\(f\), and the "Analysis and overall impact" tables\)](#). The Plan must:

- estimate carbon-price impacts on households, transport users and micro-enterprises;
- set out who counts as 'vulnerable' nationally and how you identified them;
- give numbers for each group to be targeted; and
- include targets/indicators to track reductions in energy/transport poverty over 2026-2032.

[Vulnerability cannot be explained by income alone](#), instead incorporating a multidimensional definition.

EJNI recommends that the Department of Climate, Energy and the Environment (DCEE) publish the full vulnerability methodology alongside the draft SCP so stakeholders can test the assumptions, consistent with [Commission good-practice on SCP consultations](#) (early, continuous, and inclusive).

2. Use a multidimensional definition of vulnerability (not income-only)

The [SCF Regulation](#) recognises that energy and transport poverty cannot be explained by income alone: people may spend a high share on energy/transport, lack affordable alternatives, and lack the means to

invest in low/zero-carbon options; geographic specificities (rural, islands, peripheries) also matter. For Ireland, EJNI proposes that vulnerability is determined by overlapping variables:

Household-level

- Low income / high energy, little or no agency to implement solutions, mobility cost burden.
- Housing quality and energy performance (worst-performing BERs, damp/defect indicators).
- Heating fuel.
- Tenure & agency: private renters and social housing with little control over upgrades.
- Geography & access: rural/island/peri-urban areas with poor public transport.
- Demographics and gender: older people (especially older women living alone), women in low-income households, people with disabilities/health needs, lone-parent households, women, Traveller families, and other marginalised groups in precarious housing.

Micro-enterprise-level

- Energy-intensive premises; tenanted commercial units (limited control to retrofit); rural/peripheral locations with poor transport/logistics options.

3. Build a transparent mapping from linked datasets

In its assessment of Ireland's National Energy and Climate Plan, [the European Commission noted](#) that Ireland lacked the analytical basis needed for the preparation of the SCP, including the identification of vulnerable groups (pg. 54).

Much of the relevant data already exists in Ireland including BER data, income and disposable income by small areas, deprivation indices, Census data on housing and heating, and commuting data as well as administrative information on income supports and business microdata. However, these datasets are fragmented across agencies, coverage may be uneven (for example, BER data is incomplete), access to some sources may be restricted, and key dimensions such as transport cost burdens are not systematically measured. There are also considerable gaps. In particular, compared to energy poverty, [transport poverty is under-measured](#); Ireland lacks official indicators.

The SCP should commit to developing and publishing an integrated national vulnerability map that combines these data sources with lived-experience input, in line with Annex V of the SCF Regulation. While developing a fully integrated vulnerability map will take time, the SCP should use the best available data to produce a baseline analysis now, and commit to refining and publishing a more comprehensive vulnerability mapping during implementation. This avoids further delay while ensuring that Ireland remains compliant with [Annex V of the SCF Regulation](#) (which requires Member States to include, *at the time of submission*, estimation and identification of vulnerable households, transport users and micro-enterprises) and [Commission guidance](#) on iterative plan development in the instance of missing data.

4. Prioritise vulnerability groups (targeting tiers)

EJNl proposes the following prioritisation:

Tier A - high priority (structural measures first, income support as bridge). These groups face the highest energy/transport poverty risks and have least control over solutions.

- Social housing tenants cannot renovate themselves; often live in the least efficient stock; [SCF guidance](#) and NGO checklists (such as from the [European Environmental Bureau](#), [Bankwatch](#)) stress social housing as the top priority.
- Private renters in worst-performing dwellings pay high energy costs but have no retrofit agency; require safeguards against renovations/rent increases.
- Rural/island households reliant on expensive, polluting fuels (oil, coal, peat); transport poverty is compounded by poor public transport.
- People with disabilities/older people energy needs are health-critical and [Article 6\(1\)\(q\) of the SCF Regulation](#) explicitly requires gender and equality-sensitive targeting.

Tier B - targeted structural support. Tier B groups are significant but have more options than Tier A if supports are designed correctly (e.g. upfront grants, one-stop shops).

- Low-income owner-occupiers in older, inefficient homes but they have some agency to renovate if given adequate grant support.
- Vulnerable micro-enterprises in rented premises or inefficient units, with high costs but potential to benefit from dedicated advice, retrofit support, and grants.

Under Tier A and Tier B, where transport access is a primary constraint (rural/island/peripheral), implement transport service and affordability measures in parallel with housing fixes.

Tier C - transport users. Tier C is important but sequenced after structural housing/energy fixes, as the most severe risks (fuel poverty, cold homes, health needs) lie in Tiers A and B.

- Households with low access to reliable public transport (availability/frequency) and high cost burden; prioritise service access & affordability before private EV grants.

5. Targeting mechanisms that are simple, fair and auditable

The [SCF Regulation](#) and [Commission notes on good practice](#) stress: keep access to support simple, remove barriers, and work with trusted intermediaries. EJNl recommends:

- Eligibility “gateways” (automatic/fast-track):
 - Households receiving Fuel Allowance, HAP, or Disability Allowance; tenants in BER F/G dwellings; off-gas-grid postcodes; island/remote small areas.
 - Micro-enterprises that are very small in size (few staff and low turnover), operating in certain sectors where energy or transport costs are high, or located in areas identified as vulnerable.

- Area-based targeting for small-areas with a high concentration of: worst BERs, solid-fuel heating, low public transport access, or high deprivation.
- Renting safeguards: tie retrofit grants to no-eviction/no-excessive-rent-increase conditions (mirroring [Germany/Belgium practice cited by the European Environmental Bureau](#) (2025)).
- Upfront subsidies and zero-payment models for low-income households (avoid debt-based support).
- Regional one-stop shops co-managed with councils, housing associations, anti-poverty networks and energy communities for outreach, applications and hand-holding.
- Community-led delivery: enable energy communities to prioritise vulnerable members for renewable energy consumption and demand response (eligible actors under the SCF).

6. Match supports to each vulnerability profile

EJNl proposes a two-track package consistent with [Recital 13](#), [Articles 7-8](#) and the [SCP guidance template](#): structural first and income support as a temporary bridge.

- Buildings/energy: deep retrofits for social housing and worst-performing private rentals/owner-occupied homes, paired with clean heat and rooftop solar/storage where feasible; upfront grant models for low-income and technical assistance via one stop shops; and supported energy-sharing initiatives in estates and rural towns.
- Transport: availability and frequency of public transport in identified weak-spots; reduced fares for vulnerable users; tailored demand-responsive services in rural/island areas; support shared mobility and access to e-bikes/cargo bikes before private EV grants.
- Micro-enterprises: Retrofit and clean-heat grants for premises (especially tenanted); and small business one-stop-shops for technical/finance advice.
- Temporary direct income support: Temporary direct income support should be time-limited (for e.g., 12-18 months) and remain within the 37.5% cap set by the Regulation. Payments must be targeted automatically to vulnerable households and delivered simply through existing welfare systems. Direct income support should include a contingency mechanism that extends protection where structural measures have not yet reached households, so no one is left behind. However, they should also act as a bridge into structural solutions: each payment should be linked to outreach that directs recipients towards retrofit schemes, clean heating upgrades, or affordable mobility options, ensuring short-term relief leads to long-term change. Payments should be communicated transparently as a “Climate Bonus” or “Carbon Dividend”, clearly showing that revenues from carbon pricing are being recycled back to support vulnerable groups.

All structural measures must satisfy the Do No Significant Harm principle and exclude fossil lock-ins. The SCP should explain how national carbon tax revenues are already impacting households and how SCF-funded measures will complement those.

IMPORTANT: While the SCF provides important support, its funding envelope is limited. To deliver meaningful and scalable outcomes, Ireland’s SCP must be underpinned by clear national co-financing commitments that go beyond the 25% minimum required by the Regulation. In line with the principle of

additionality, these resources must be genuinely new, expanding the overall level of support, and not simply substituting for existing national energy poverty or climate budgets. Ireland should publish a transparent financing table showing the combined contributions from the SCF, carbon tax receipts, cohesion funds, and the Recovery and Resilience Facility (RRF). For cohesion policy, the Regulation allows transfers to and from the SCF (up to 15%), but safeguards are needed to avoid substitution. SCF resources must complement, not replace, cohesion programmes. Moreover, because Ireland has sought a derogation from ETS 2, which would reduce expected SCF receipts, the Government must compensate by committing greater domestic resources, including the redirection of fossil-fuel subsidies, to ensure the SCP remains robust and impactful.

7. Governance and Verification

- Publish vulnerability mapping: Commit to publishing the vulnerability map, methodology, and disaggregated indicators (gender, age, geography, tenure, disability), and update them biennially using Annex IV common indicators.
- Set up an SCP Monitoring Committee: Include local authorities, trade unions, anti-poverty groups, tenant and Traveller organisations, housing associations, SME representatives, and energy communities to review progress and advise on corrections.
- Independent evaluation: Commission mid-term and final evaluations to verify whether SCP measures are reducing energy and transport poverty and to ensure funds are well targeted.

To avoid the slow and uneven rollout seen in other EU funds, Ireland must provide additional national co-funding to supplement the 2.5% administrative cap. This investment is needed to build the delivery capacity of local authorities, create a dedicated SCF Delivery Unit, and ensure monitoring and accountability structures are fully resourced.

For a full outline of EJNl's position on what needs to be in Ireland's Social Climate Plan, see our resource paper published earlier this year, [Six Priorities for Ireland's Social Climate Plan](#).

In summary, EJNl recommends that Ireland identify and prioritise vulnerable groups using a multidimensional, data-driven method that combines income/cost burden with housing performance, heating fuel, tenure, geography and access to alternatives, and demographic/health factors then publish the methodology, maps and numbers required by the SCF Regulation. The highest priority should be social housing tenants, private renters and low-income owner-occupiers in worst-performing homes, rural/island households off the gas grid, people with disabilities/older people, and marginalised groups; for micro-enterprises, focus on tenanted/inefficient premises and peripheral locations. Targeting should use automatic eligibility gateways, area-based small-area mapping, and regional one-stop shops co-managed with councils/NGOs/energy communities, with upfront grants and renter safeguards. Structural measures (retrofits, clean heat, community energy, public/shared transport) come first; temporary direct income support is time-limited and linked to those pathways, all within SCF rules on DNSH, indicators and consultation.

The Plan aims to support both rural and urban areas impacted by the rising price of carbon through Ireland's Social Climate Plan. For RURAL areas, which vulnerable groups do you propose should be supported in order of priority?

1. Rural Vulnerable Households

(Rationale: These must come first because rural households often face the highest energy poverty risks: poorly insulated homes, dependence on expensive fossil heating, limited access to retrofit schemes, and higher energy needs due to dispersed housing. Many also have low incomes, are older, or live in the private rental sector with little control over upgrades).

2. Rural Vulnerable Transport Users

(Rationale: Transport poverty is especially acute in rural Ireland, where households depend on private cars due to the absence of reliable public transport. Low-income rural households spend a disproportionate share of income on fuel, and lack affordable alternatives (public transport, e-bikes, shared mobility)).

3. Rural Vulnerable Micro-Enterprises

(Rationale: Many rural micro-enterprises are energy-intensive (e.g. in agri-food, retail, or tourism) and have limited capital to invest in clean energy or fleet upgrades. Without support, they risk passing on costs to communities or closing altogether, which would undermine local employment.)

4. Equal priority for all groups

(Rationale: While households, transport users and micro-enterprises are all important, EJNl recommends a clear sequencing to ensure that limited SCF resources first address basic needs (warm, affordable homes and access to essential transport) before extending to enterprise support.)

Please explain why you propose this order of priority?

EJNl proposes that in rural areas, vulnerable households should come first, followed by vulnerable transport users, and finally rural micro-enterprises. This sequencing reflects both the urgency of need and the purpose of the SCF. Rural households face high rates of energy poverty because much of the housing stock is older and poorly insulated, heating is heavily reliant on expensive fossil fuels such as oil, coal, and solid fuel/peat, and access to affordable retrofit schemes is limited. Many rural households are on low or fixed incomes, including older people, lone parents, and people with disabilities, while private renters and social tenants have no control over upgrades. Ensuring that homes are warm directly addresses the SCF's mandate to tackle energy poverty.

[Transport poverty](#) also weighs heavily on rural Ireland, where households are dependent on private cars because reliable public transport is limited or absent. Low-income rural households spend a disproportionate share of their income on fuel, leaving them highly exposed to rising carbon prices. Addressing transport poverty is critical to ensuring access to work, education, and healthcare in line with EPSR Principles 11 and 20, but energy-inefficient homes must be tackled first as cold housing poses immediate health risks.

Finally, many small rural businesses, particularly in agri-food, retail, and tourism, are energy-intensive but lack the capital to invest in clean energy or fleet upgrades. Supporting them is important for jobs and local

resilience. Enterprise support should therefore follow household and transport measures, and should focus on grants, retrofits, and clean energy upgrades rather than debt-based finance. Equal priority is not sufficient: sequencing is necessary because SCF resources are limited. By addressing basic needs first, that is, warm homes and affordable mobility, Ireland ensures compliance with the Regulation's emphasis on vulnerable households and transport users, while still reserving targeted support for rural micro-enterprises.

The Plan aims to support both rural and urban areas impacted by the rising price of carbon through Ireland's Social Climate Plan. For URBAN areas, which vulnerable groups do you propose should be supported in order of priority?

1. Urban Vulnerable Households (top priority)

(Rationale: Energy poverty is widespread in cities, particularly among low-income renters in poorly insulated private rental housing and social housing. Urban households face the "split incentive" barrier, where landlords have little incentive to invest in retrofits but tenants carry high energy bills. Many vulnerable households also rely on direct fossil heating sources, leaving them highly exposed to carbon price increases. Supporting these groups first is consistent with the SCF Regulation's emphasis on prioritising vulnerable households.)

2. Urban Vulnerable Transport Users

(Rationale: Although public transport coverage is better in urban than rural areas, affordability and accessibility remain barriers. Low-income households, young people, people with disabilities, and shift workers often face high transport costs or limited access to safe and reliable services. Higher fuel costs could exacerbate exclusion unless targeted supports such as concessionary fares, mobility budgets, or support for e-bikes and shared mobility are introduced.)

3. Urban Vulnerable Micro-Enterprises

(Rationale: Many micro-enterprises in cities operate in retail, hospitality, and services from older, inefficient premises and face rising energy bills. They may lack the capital to invest in clean heating, efficiency upgrades, or electric delivery fleets. While important for local economies, support for enterprises should follow households and transport users to ensure that people's basic needs for housing and mobility are met first.)

4. Equal priority for all groups

(Rationale: EJNl does not support a "flat" prioritisation. The SCF is designed to protect the most vulnerable from carbon costs. Sequencing support starting with households and transport users ensures scarce resources target the groups most at risk of poverty and exclusion, before extending to enterprises.)

Please explain why you propose this order of priority:

EJNl proposes that in urban areas, vulnerable households should be supported first, followed by vulnerable transport users, and finally vulnerable micro-enterprises. This order reflects the purpose of the Social

Climate Fund, which is to protect those most exposed to carbon costs and lacking the means to invest in alternatives. Households must come first because urban energy poverty is widespread, particularly among low-income renters in poorly insulated private rental housing and social housing. Tenants often face the “split incentive” problem: landlords have little incentive to retrofit, while tenants carry the burden of high bills and direct fossil heating costs. Addressing this group directly delivers on the SCF’s requirement to prioritise vulnerable households. The next priority should be transport users. While urban areas generally enjoy better public transport coverage than rural communities, many low-income households, young people, disabled people, and shift workers struggle with affordability and reliability. Without targeted supports such as concessionary fares, mobility budgets, or access to shared and active mobility, rising fuel costs risk deepening exclusion. Support for micro-enterprises is also important, particularly for small businesses operating from older, inefficient premises with high energy bills. However, enterprise measures should follow after the most urgent needs of households and transport users are met. Sequencing support in this way avoids a flat prioritisation and ensures scarce resources target the groups most at risk of poverty and exclusion before extending to businesses.

Part 2: Prioritisation of Measures and Investments in RURAL areas for Vulnerable Groups

The SCF Regulation and associated guidance documents elaborate upon which types of measures and investments would be eligible for inclusion in the Social Climate Plan. In this section we seek to understand which measures would best support the vulnerable groups in RURAL areas. We present a non-exhaustive list of possible options below with a space for proposals from the public. By ranking measures in order of priority for each vulnerable group, we will gain insight into which proposed and eligible measures should be supported.

Supports for RURAL VULNERABLE HOUSEHOLDS with measures related to the Built Environment

Eligible measures and investments to support vulnerable households in rural areas have been summarised below. Please rank the measures in order of priority

1. Building retrofit supports for vulnerable households in local authority social housing.
(Rationale: Highest priority: tenants have no control over retrofits, stock is often old and inefficient, and benefits will reach the most vulnerable directly.)
2. Building retrofit supports for vulnerable households in approved housing body (AHB) social housing.
(Rationale: AHB tenants are also highly vulnerable (elderly, disabled, formerly homeless), with no agency over upgrades.)
3. Building retrofit support for vulnerable households in old energy poor buildings.
(Rationale: Urgent in rural areas, where poorly insulated dwellings are common; delivers immediate relief for households outside social housing.)
4. Building retrofit supports for vulnerable households in privately owned dwellings.
(Rationale: Many rural homeowners are low-income and cannot afford upgrades; support must be grant-based, not debt-based.)
5. Support for One-Stop-Shop Energy Efficiency Information Hubs for vulnerable households.

(Rationale: Vital enabling measure to ensure households can access schemes; must be regional, with outreach into rural communities.)

6. Integrating renewable energy solutions for generation, storage and consumption for vulnerable households in social housing.

(Rationale: Should go hand in hand with retrofits to reduce bills long-term and lock in clean energy benefits for tenants.)

7. Integrating renewable energy solutions for generation, storage and consumption for vulnerable households in privately owned dwellings.

(Rationale: Important, but secondary to energy efficiency retrofits; should be targeted to those in energy poverty.)

8. Support development and provision of appropriate funding instruments in line with the Social Climate Plan's goals (e.g. low-cost retrofit loans) for vulnerable households.

(Rationale: Loans are less suitable for the most vulnerable, but grant-based or blended models can complement other measures.)

9. Build new social housing units for local authorities for vulnerable households.

(Rationale: Important for long-term housing justice, but not eligible under the SCF and should be funded through national housing budgets instead.)

10. Conversion of vacant and derelict commercial properties into social housing for vulnerable households.

(Rationale: Also important, but outside the SCF scope; should be pursued under Housing for All and other funding streams.)

Please explain your preference here and expand on any “other measures” you wish to suggest:

EJNl prioritises deep retrofits and renewable integration in existing housing stock as these are clearly eligible under the Social Climate Fund and deliver immediate relief to rural vulnerable households experiencing energy poverty. Local authority and AHB tenants should be prioritised first, as they have no control over efficiency upgrades, followed by retrofits for old energy-poor private homes and low-income homeowners.

Renewable integration (solar, storage, heat pumps) should complement retrofits to secure long-term affordability. One-stop-shops and appropriate funding instruments are necessary enabling measures, but loans should not replace grants, as many rural households cannot take on debt.

While building new social housing and converting vacant/derelict properties are vital for addressing structural housing shortages, these measures fall outside the SCF's remit and must instead be resourced through Ireland's national housing budgets and complementary EU funds.

EJNl also recommends adding targeted supports for Traveller accommodation and marginalised rural communities, and for community-led renewable heating and energy-sharing initiatives to build local resilience.

Supports for RURAL VULNERABLE MICRO-ENTERPRISES with measures related to the Built Environment.

Eligible measures and investments to support vulnerable micro-enterprises in rural areas in the buildings sector have been summarised below. Please rank the measures in order of priority.

1. Other measures: Energy efficiency retrofits for vulnerable micro-enterprises (i.e., fabric-first upgrades).

(Rationale: prioritises energy efficiency consistent with the EU's "energy efficiency first" principle.)

2. Integrating renewable energy solutions for generation, storage and self-consumption.

(Rationale: Once efficiency is addressed, clean heat and renewables (e.g. PV, storage, demand-response) reduce ongoing bills, provide energy independence, and cut exposure to fossil price volatility.)

3. Support for One-Stop-Shop Energy Efficiency Information Hubs.

(Rationale: Vulnerable micro-enterprises may lack the capacity or expertise to apply for schemes. Trusted intermediaries offering technical advice and hand-holding are essential to ensure access, especially in rural and peripheral areas.)

4. Support development and provision of appropriate funding instruments (grants and blended models).

(Rationale: Access to finance is a barrier, particularly in rented premises. Grant-based models should dominate.)

5. Conversion of vacant and derelict commercial properties into commercial and community spaces.

(Rationale: Important for rural regeneration, but not the core purpose of the SCF; better financed through national housing, regional development, or cohesion funds.)

Please explain your preference here and expand on any "other measures" you wish to suggest

EJN considers deep retrofits of rural micro-enterprise premises the most urgent priority, as they deliver immediate reductions in energy costs and cut fossil fuel dependence. Renewables should follow to lock in long-term affordability. One-stop-shops are essential for outreach and technical advice, and funding instruments must prioritise grants and upfront subsidies over loans, since many micro-enterprises cannot take on new debt.

While conversions of vacant or derelict commercial properties are useful for rural regeneration, they fall outside the clear scope of the SCF and should be funded by other national/EU programmes.

Supports for RURAL VULNERABLE TRANSPORT USERS.

Eligible measures and investments to support vulnerable transport users in rural areas have been summarised below. Please rank the measures in order of priority.

1. Improve availability and accessibility of Public Transport for vulnerable transport users.

(Rationale: In rural and island areas the problem is lack of service altogether, leaving people car-dependent. Ensuring availability and accessibility is the most effective way to tackle transport poverty and provide equitable access to work, education, and healthcare.)

2. Improve performance, scale and frequency of existing Public Transport for vulnerable transport users.

(Rationale: Where services do exist, they are often infrequent or unreliable. Increasing frequency and coverage ensures rural transport is a real alternative to private cars, reducing costs and exclusion for low-income households, young people, older people, and those with disabilities.)

3. Financial incentives for using and making Public Transport more affordable.

(Rationale: Once availability and frequency are improved, affordability becomes critical. Reduced fares, concessionary passes, and capped rural tariffs ensure vulnerable users can actually use services without financial strain.)

4. Support public, private and community entities in providing sustainable mobility options such as mobility hubs and on-demand shared services.

(Rationale: Community transport, demand-responsive buses, and shared mobility hubs can fill gaps in very dispersed areas where fixed public transport routes are not viable, particularly benefiting older people and those with no car access.)

5. Support for private and commercial bicycles, electric bikes and cargo bikes and related facilities.

(Rationale: E-bikes and cargo bikes can provide affordable alternatives where distances are manageable. They are particularly useful in small towns and villages, but should complement, not substitute, investment in public transport.)

6. Support for private and commercial zero/low-emission vehicles and related infrastructure.

(Rationale: While EVs may reduce emissions, they are not an effective anti-poverty measure for vulnerable rural households due to high upfront costs. SCF funds should only support EV access after higher-priority needs (public transport and shared mobility) are met.)

7. Other measures: Targeted support for accessibility (e.g. wheelchair-accessible community transport, safe walking and cycling routes in rural towns). Integrated ticketing and journey planning across rural buses, trains, and shared mobility, ensuring seamless and affordable connections.

Please explain your preference here and expand on any “other measures” you wish to suggest:

Transport poverty is not just about fuel prices but about exclusion from affordable alternatives. Priorities must be:

- Availability and accessibility of public transport in underserved areas.
- Performance and frequency - reliable, frequent services.
- Affordability - reduced fares or free passes for low-income groups.

EJNl prioritises improving access to, and investment in, rural public transport services as the most effective way to reduce transport poverty and dependency on private fossil-fuel vehicles. For this reason, improving availability and accessibility and improving performance, scale and frequency of existing public transport should be treated as joint top priorities. In many rural areas, services either do not exist at all or are so infrequent as to be unusable. Addressing both coverage and frequency is essential to provide vulnerable households with a genuine alternative to car dependency.

Financial incentives to make public transport more affordable are the next priority. Affordability is vital once services are in place, but subsidies cannot substitute for the absence of reliable and frequent public transport. Together, availability, frequency, and affordability must all be addressed to ensure public transport is a real and equitable option.

Complementary community-led mobility options and shared services (e.g. mobility hubs, demand-responsive transport, on-demand shared bikes and EV car clubs) can help fill gaps in more remote areas where fixed-route services are not viable. Additional measures should include safe walking and cycling connections and guaranteed accessibility for people with disabilities and older users.

While e-bikes and EVs have a role, they should not be the focus of Social Climate Fund spending, as they risk reinforcing private car dependency and excluding those who cannot afford vehicle ownership. Any EV support should be highly targeted and secondary to investment in shared and public transport.

All of these measures fall clearly within the targeted scope of the Social Climate Fund, which is designed to tackle energy and transport poverty among vulnerable groups through structural solutions rather than temporary fixes.

Supports for RURAL VULNERABLE MICRO-ENTERPRISES with transport measures.

Eligible measures and investments to support vulnerable micro-enterprises users in rural areas in the transport sector have been summarised below. Please rank the measures in order of priority:

1. Improve availability and accessibility of Public Transport.

(Rationale: Many rural micro-enterprises face high transport costs due to lack of alternatives. Extending public transport routes and accessibility reduces reliance on fossil fuels for deliveries, staff commuting, and customer access.)

2. Improve performance, scale and frequency of existing Public Transport.

(Rationale: A service that exists but is unreliable or infrequent does not support rural businesses. Improving frequency and reliability ensures public transport is a viable option for staff, customers, and supply chains.

3. Financial incentives for using and making public transport more affordable.

(Rationale: Helps micro-enterprises and their workers afford to shift to public transport. Fare subsidies, transport vouchers, or discounted passes can ease the transition, but only work if services are available and reliable (hence ranked third).

4. Support public, private and community entities in providing sustainable mobility options such as mobility hubs and on-demand shared services including shared bikes, e-scooters and electric vehicles.

(Rationale: In remote rural areas where fixed public transport is difficult, demand-responsive shared mobility can fill gaps. Community-led mobility hubs can support both micro-enterprises and households.)

5. Support for private and commercial bicycles, electric bikes and cargo bikes and related facilities.

(Rationale: Cargo bikes and e-bikes are useful for certain rural enterprises (last-mile delivery, local services), but less feasible for longer rural distances. Should be encouraged but not prioritised above systemic PT improvements.)

6. Support for private and commercial zero/low emissions vehicles and related infrastructure.

(Rationale: Subsidies for private/commercial vehicles risk locking in car dependency and disproportionately benefiting better-off enterprises. SCF support should be highly targeted and only secondary to public/shared mobility investment.)

7. Other measure or investment in the transport sector: This should cover:

- Demand-responsive transport tailored to rural enterprise needs (goods and staff mobility).
- Freight consolidation hubs to reduce fuel costs for small businesses.
- Accessibility measures ensuring small enterprises employing disabled or older workers are not excluded.

Please explain your preference here and expand on any “other measures” you wish to suggest:

EJNl’s priority is to reduce transport poverty structurally, by making rural public and shared transport a viable, affordable option for micro-enterprises and their workers. Therefore, availability, frequency, and affordability of public transport are ranked top three. Complementary community mobility services are next, while private EV supports are ranked lower, as they risk reinforcing car dependency and excluding the most vulnerable.

Part 3: Prioritisation of Measures and Investments in URBAN areas for Vulnerable Groups

The Regulation and associated guidance documents elaborate upon which types of measures and investments would be eligible for inclusion in the Social Climate Plan. In this section we seek to understand which measures would best support the vulnerable groups in URBAN areas. We present a non-exhaustive list of possible options below with a space for proposals from the public. By ranking measures in order of priority for each vulnerable group, we will gain insight into which proposed and eligible measures should be supported.

Supports for URBAN VULNERABLE HOUSEHOLDS with measures related to the Built Environment

Eligible measures and investments to support vulnerable households with their homes in urban areas have been summarised below. Please rank the measures in order of priority.

1. Building retrofit supports for vulnerable households in local authority social housing.
(Rationale: Highest priority because tenants have no agency over upgrades, the stock is often old and inefficient, and retrofits directly reduce bills and health risks.)
2. Building retrofit supports for vulnerable households in approved housing body (AHB) social housing
(Rationale: AHB tenants are often elderly, disabled or formerly homeless with very limited control over upgrades, making them especially vulnerable.)
3. Building retrofit support for vulnerable households in old energy poor buildings.

(Rationale: Many urban dwellings are poorly insulated and expensive to heat; upgrading them reduces energy poverty and emissions quickly.)

4. Building retrofit supports for vulnerable households in privately owned dwellings
(Rationale: Low-income owner-occupiers in inefficient homes face high energy costs but can benefit if supports are structured as upfront grants, not loans.)
5. Support for One-Stop-Shop Energy Efficiency Information Hubs for vulnerable households
(Rationale: Critical enabling measure that provides trusted advice and outreach, ensuring households actually access schemes and avoid administrative barriers. [Research shows](#) that even where cost-saving potential exists, lack of awareness, distrust, or reluctance to take on debt are major barriers. Uptake requires trusted intermediaries and proactive outreach).
6. Integrating renewable energy solutions for generation, storage and consumption for vulnerable households in social housing
(Rationale: Coupling retrofits with solar PV, storage and clean heat locks in long-term bill savings for tenants and maximises the benefits of public investment.)
7. Integrating renewable energy solutions for generation, storage and consumption for vulnerable households in privately owned dwellings.
(Rationale: Important for decarbonisation and long-term affordability but should follow efficiency upgrades to ensure effectiveness.)
8. Support development and provision of appropriate funding instruments in line with the Social Climate Plan's goals (e.g. low-cost retrofit loans) for vulnerable households
(Rationale: Loans are less suitable for the most vulnerable but blended or grant-heavy models can help other low- and middle-income households retrofit.)
9. Build new social housing units for local authorities for vulnerable households
(Rationale: Essential for long-term housing justice, but not eligible under the SCF; requires separate funding through national housing programmes.)
10. Conversion of vacant and derelict commercial properties into social housing for vulnerable households
(Rationale: Important for addressing urban housing shortages but outside the SCF's scope; should be pursued under Housing for All and cohesion funds.)
11. Other measure or investment for the building sector

Please explain your preference here and expand on any “other measures” you wish to suggest:

EJNl prioritises deep retrofits in existing social housing stock (local authority and AHB) as the top priority, since tenants in these homes have no control over upgrades yet are disproportionately at risk of energy poverty. These retrofits deliver the most immediate and equitable impact.

Old energy-poor buildings should follow, given the prevalence of inefficient pre-2000 housing in Irish cities. After this, support should extend to privately owned dwellings occupied by low-income households, with strong grant-based support to ensure affordability.

Renewable energy integration (solar PV, storage, heat pumps, district heating) should accompany retrofits to lock in long-term affordability and resilience, with priority given to social housing before private dwellings.

One-stop-shops are critical for enabling access and should be designed to work with community organisations, housing associations, and anti-poverty networks. Funding instruments should emphasise

grants and upfront subsidies rather than loans, as low-income urban households are not in a position to take on additional debt.

While new builds and conversions of vacant/derelict properties are important for addressing the housing crisis, they fall outside the clear scope of the Social Climate Fund. These should instead be financed through Housing for All and complementary EU/national funds.

Finally, under “other measures”, EJNI recommends:

- Ensuring protections against “renovictions” and rent increases post-retrofit.
- Prioritising Traveller accommodation and other marginalised groups often excluded from mainstream retrofit programmes.
- Establishing monitoring committees including tenants, housing associations, and community groups to oversee delivery.

Supports for URBAN VULNERABLE MICRO-ENTERPRISES with measures related to the Built Environment.

Eligible measures and investments to support vulnerable micro-enterprises in urban areas in the buildings sector have been summarised below. Please rank the measures in order of priority.

1. Other measures or investment in the building sector.

(Rationale: This should be used to prioritise deep retrofits of business premises (insulation, heating upgrades, ventilation, efficiency improvements) as the top SCF priority. Retrofits deliver immediate reductions in operating costs and reduce fossil fuel reliance.)

2. Integrating renewable energy solutions for generation, storage and consumption for vulnerable small businesses.

(Rationale: Following retrofits, renewable energy integration (solar PV, storage, heat pumps) helps lock in long-term affordability and sustainability.

3. Support for One-Stop-Shop Energy Efficiency Information Hubs.

(Rationale: Urban micro-enterprises often lack the capacity to navigate technical and financial schemes. Local hubs co-managed with enterprise and community groups can provide tailored advice and outreach.)

4. Support development and provision of appropriate funding instruments in line with the Social Climate Plan's goals (e.g. low-cost retrofit loans)

(Rationale: Useful as a complement, but EJNI stresses that grants and upfront subsidies should come before loans, since many micro-enterprises cannot afford additional debt.)

5. Conversion of vacant and derelict commercial properties into commercial and community spaces.

(Rationale: Important for urban regeneration but falls outside the core scope of the Social Climate Fund. Should be resourced through other funding streams (Urban Regeneration Funds, etc.), not SCF.)

Please explain your preference here and expand on any “other measures” you wish to suggest:

EJNl prioritises deep retrofits of existing urban micro-enterprise premises as the most urgent need, as this delivers immediate energy cost reductions and cuts fossil fuel dependence. Once retrofits are secured, renewable energy integration can provide stable, long-term affordability.

One-stop-shop hubs are essential enabling measures, ensuring vulnerable micro-enterprises can access schemes and technical advice. Funding instruments should prioritise grant-based and upfront support, as loans are not viable for many small businesses already under financial strain.

While conversion of derelict commercial properties is valuable for urban regeneration, this measure is unlikely to fall within the SCF’s remit and should be supported under complementary national and EU funds.

Other measures EJNl recommends:

- Supports for micro-enterprises renting commercial units, who have limited control over renovations.
- Community energy models allowing groups of small businesses to share renewable generation and storage capacity.
- Targeted accessibility measures to ensure inclusion of enterprises led by, or serving, disabled and minority communities.

Supports for URBAN VULNERABLE TRANSPORT USERS.

Eligible measures and investments to support vulnerable transport users in urban areas have been summarised below. Please rank the measures in order of priority.

1. Improve availability and accessibility of Public Transport.
(Rationale: Essential first step: many urban micro-enterprises depend on staff and customers having reliable access. Without coverage, other measures are ineffective.)
2. Improve performance, scale and frequency of existing Public Transport for vulnerable transport users.
(Rationale: Reliability and frequency are critical for micro-enterprises to benefit from public transport. A bus or train that is infrequent or unreliable undermines business activity and employment stability.)
3. Financial incentives for using and making public transport more affordable.
(Rationale: Once coverage and reliability are in place, affordability ensures both staff and customers can actually use public transport. Subsidies, passes, or vouchers reduce the burden of rising transport costs on small businesses and workers.)
4. Support public, private and community entities in providing sustainable mobility options such as mobility hubs and on-demand shared services including shared bikes, e-scooters and electric vehicles.

(Rationale: Shared mobility services can complement public transport, especially in urban areas where micro-enterprises may benefit from flexible, low-cost, last-mile delivery or staff mobility options.)

5. Support for private and commercial bicycles, electric bikes and cargo bikes and related facilities.
(Rationale: Cargo bikes and e-bikes can be highly effective for urban last-mile deliveries, particularly in dense city areas, but should come after systemic public transport improvements.)
6. Support for private and commercial zero/low emissions vehicles and related infrastructure.
(Rationale: While EVs have a role, subsidies for private or commercial vehicles risk benefitting better-off businesses and reinforcing dependency on private car/van ownership. They should be secondary and highly targeted.)
7. Other measure or investment in the transport sector: This could include:
 - Dedicated urban consolidation centres for deliveries to reduce freight traffic and fuel use.
 - Accessible transport measures to ensure micro-enterprises employing disabled or older workers are not excluded.
 - Expansion of safe cycling infrastructure linking workplaces and customers.*

Please explain your preference here and expand on any “other measures” you wish to suggest:

EJNI prioritises structural improvements in urban public transport (availability, reliability, and affordability) as the most effective way to support vulnerable micro-enterprises and their employees, reducing reliance on private fossil-fuel vehicles and cutting costs. Complementary shared mobility options and cargo bike solutions can support last-mile delivery and flexible business needs, but must come after investment in core public transport.

While electric vehicles may play a role, they should not be the focus of SCF spending, as they risk reinforcing vehicle dependency and excluding micro-enterprises that cannot afford vehicle ownership. Instead, SCF investments should prioritise public/shared solutions and structural reductions in transport poverty.

Is there anything you feel is important in the context of the Social Climate Plan that has not been covered in this survey? Word limit (1500 words)

EJNI welcomes the opportunity to comment on the development of Ireland’s Social Climate Plan. The SCP is an important instrument for ensuring that the transition to climate neutrality is fair, inclusive, and protects those most vulnerable to the impacts of rising fossil fuel prices.

For a full outline of EJNI’s position on what needs to be in Ireland’s Social Climate Plan, see our resource paper published earlier this year, [Six Priorities for Ireland’s Social Climate Plan](#).

1. The SCP consultation process

While we have engaged with the consultation survey and ranked the proposed measures, we are concerned that the survey is too narrow to allow stakeholders to meaningfully assess whether Ireland’s draft SCP will be compliant with EU law and whether it will adequately protect vulnerable groups. The SCF Regulation requires Member States to:

- identify national patterns of vulnerability, with transparent methodologies for estimating the number of vulnerable households, transport users, and micro-enterprises;
- set out targets, milestones, and indicators for building renovation, clean mobility, and reducing vulnerable groups;
- demonstrate additionality, showing that measures are new or scaled up, not a rebranding of existing programmes;
- provide clarity on funding sources and national co-financing, and how double-funding will be avoided;
- ensure compliance with the Do No Significant Harm principle;
- align with the European Pillar of Social Rights, the National Energy and Climate Plan, the Building Renovation Plan.

None of these elements are outlined in the survey. Unless stakeholders can review and comment on a full draft SCP, consultation risks being perceived as a “tick-box exercise,” contrary to [the Commission’s guidance](#), which warns that a single event or survey at the end of drafting is “likely to add limited value.” (pg 8)

We note the six-week consultation period and plans for a public event, but remain concerned that a one-off event does not provide sufficient time or depth for meaningful engagement. To be credible, Ireland’s consultation must:

- Publish the full draft SCP at the outset, not only at a public event.
- Allow at least six weeks for stakeholders to review and comment on the full draft.
- Ensure consultation covers not only measures but also definitions of vulnerability, targeting, financing of measures including co-financing, monitoring of implementation, and alignment with other policy frameworks.

The [Commission’s own good practice note](#) stresses early, continuous engagement, with stakeholders involved throughout the drafting process and given an opportunity to comment on the draft itself. Ireland must balance urgency with inclusiveness: publish the draft SCP immediately, allow adequate review time, and then submit a final version that integrates feedback.

2. Timing and Risks

Under the SCF Regulation, Member States that submitted SCPs by June 2025 will begin receiving funds in 2026. For Ireland, the earliest possible drawdown is now mid-2026, with the first tranche available only after Commission approval. This makes it important that Ireland is positioned to mobilise resources as early as possible in 2026. If Ireland fails to submit a robust SCP in the coming months, the first drawdown of funds may be delayed until 2027, leaving vulnerable households and micro-enterprises without targeted support for an extended period. Such delays would undermine the credibility of the plan and erode public trust.

EJNl therefore urges the Government to finalise and submit a comprehensive, evidence-based SCP quickly enough to unlock funds in 2026, while still allowing sufficient consultation time to ensure the plan is credible and inclusive.

As emphasised earlier in this consultation, the SCF alone will not be sufficient. Ireland's SCP must go beyond the 25% minimum co-financing, ensuring funds are additional rather than substituting existing budgets. A transparent financing table should show contributions from SCF, carbon tax revenues, and other complementary funds, with safeguards to avoid double counting. As Ireland has sought an ETS 2 derogation, reducing SCF receipts, the Government must offset this through greater national resources, including redirecting fossil-fuel subsidies, to keep the plan robust and impactful.

3. Evidence Gaps and Identifying and Targeting Vulnerability

The [Commission's assessment of Ireland's NECP](#) highlighted the absence of an analytical basis for identifying vulnerable groups and a lack of information on how carbon tax revenues would combine with SCF resources. Without this, SCP measures cannot be effectively targeted.

We are disappointed that the revision of the Energy Poverty Action Plan has been dropped in favour of [establishing an Energy Affordability Task Force](#). Focusing on immediate affordability may overshadow the need for long-term structural solutions to energy poverty. Without a revised EPAP, the SCP risks being based on inadequate or outdated data, undermining compliance with the SCF Regulation. To be credible, the SCP must:

- show alignment with the SCF Regulation's purpose, addressing the distributional impacts of carbon pricing on vulnerable households, micro-enterprises, and transport users;
- deliver early action, frontloading retrofits, clean heating, and public transport; and
- be based on robust evidence, with a multidimensional definition and mapping of vulnerability.

The SCF Regulation requires SCPs to identify national patterns of vulnerability. Ireland must go beyond income-only approaches. [Vulnerability is multi-dimensional](#) and must be mapped across:

- Housing – poorly insulated or fossil-fuel-heated homes.
- Tenure – renters unable to trigger retrofits.
- Geography – rural and island communities facing high transport and heating costs.
- Social groups – Traveller communities, lone parents, older people, and people with disabilities.
- Micro-enterprises – energy-intensive or leased premises with little retrofit control.

Targeting must include transparent mapping, gender- and age-disaggregated data, and involvement of local authorities, Traveller organisations, tenant unions, and disability advocates. Mechanisms for ongoing monitoring and adjustment are essential to ensure support reach those most in need.

4. Strengthening Implementation Capacity

Ireland's slow rollout of the Just Transition Fund shows the risks of weak implementation. To avoid repeating these mistakes, the SCP must:

- dedicate national co-funding for administration beyond the 2.5% SCF cap;
- establish a Delivery Unit to coordinate across departments and monitor delivery;
- strengthen local authority capacity to deliver targeted measures;
- create regional one-stop shops, co-managed by community organisations and housing associations; and
- set up monitoring committees including unions, anti-poverty groups, local authorities, and civil society.

Simplified, accessible application processes available online and in person are also essential to ensure uptake among vulnerable groups.

5. Proactive Outreach and Trusted Intermediaries

[Recent research on energy and transport poverty in Ireland](#) shows that householders rarely self-apply for support even when it could reduce their bills. Many respondents reported low awareness of available technologies and schemes, distrust of new options, and reluctance to take on debt. The study concluded that relying on households to navigate complex schemes themselves will leave many behind, and that "ever refined targeting" is not effective. To overcome these barriers, the SCP must take a proactive approach:

- Regional One-Stop Shops, co-managed with local authorities, housing associations, and community groups, should provide trusted advice, outreach, and hand-holding.
- Community intermediaries (anti-poverty networks, Traveller organisations, disability advocates, for e.g.) should be empowered and resourced to help vulnerable households access schemes.
- Simplified processes, automatic eligibility "gateways," and area-based approaches are essential so that the most vulnerable do not fall through gaps.

Embedding trusted intermediaries and proactive outreach into the SCP will ensure that structural measures reach those most in need, rather than being taken up only by better-resourced households.

6. Delivering Structural Measures

The SCP's core must be structural measures that break cycles of energy and transport poverty. EJNI supports the principle: retrofits first, renewables second, affordability supports third, private subsidies last.

7. Income Supports Linked to Long-Term Pathways

The SCF allows up to 37.5% of funds for direct income support, but these must be time-limited and transitional. This ensures income support acts as a bridge, not a substitute for structural solutions. EJNI recommends:

- Time-bound payments framed as a “Climate Bonus” or “Carbon Dividend.”
- Linking payments to long-term pathways, offering recipients guidance on retrofits or clean mobility.
- Using existing welfare systems for simple, accessible delivery.
- Including a contingency mechanism to extend support if structural measures are delayed.

8. Alignment with Broader Social and Climate Goals

The SCP must add value, not operate in isolation or substitute national spending. It must:

- align with the European Pillar of Social Rights (Principle 20: access to energy and transport; Principle 19: decent housing; Principle 11: protection from poverty)
- link with the Building Renovation Plan, ensuring continuity between SCP retrofits and long-term decarbonisation pathways;
- directly reducing numbers at risk of poverty and exclusion;
- create sustainable jobs in retrofitting, community energy, and mobility; and
- coordinate with other funding streams (Just Transition Fund, Cohesion Policy, carbon tax revenues) to maximise impact.

Conclusion

EJNl urges the Government to:

- deliver early, credible action despite the request for an ETS2 derogation;
- accurately and inclusively target vulnerability;
- strengthen implementation and accountability;
- prioritise structural measures, i.e, retrofits first, renewables second, affordability supports third, and private subsidies last;
- use income supports strategically and link them to transition pathways; and
- align the SCP with Ireland’s broader climate and social justice goals.

End.

