

**LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE**

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

**SUBMISSION FROM SCOTTISH BORDERS COUNCIL**

**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.**

- We agree that there should be a statutory target to minimise those in fuel poverty.
- We are pleased to see that the Energy Efficient Scotland Route Map will help to support this Strategy, with its main priority of removing energy efficiency as a driver of fuel poverty.
- We would argue caution around setting it as low as 5%.
  - Data availability and complexity to produce accurate statistics under the new definition may prevent certainty in terms of monitoring progress.
  - There is also concern that it does not take into account fully the regional differences in terms of tenure type, income potential, rurality etc. If certain areas are at higher risk, then to achieve a 5% reduction may require some local authorities and areas to perform better to balance poor performance elsewhere. In reality this may mean that fuel poverty has to be completely eradicated in some areas if others can only reduce fuel poverty to no more than say 10% of households elsewhere. There cannot be 'negative' fuel poverty (i.e. -5%) and so 5% may be too low.

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

- Broadly, we are supportive of the revised definition, and the effort to target those in greatest need i.e. lower income households, but this support is qualified as explained below.
- It is very difficult to gauge the impact of the revised definition for the Scottish Borders at present, as the data to assess the number of homes in fuel poverty under this definition will not be available until December 2019.
- Nonetheless, looking at the trend for Scotland as a whole, it could be anticipated that under the revised definition, the number of homes in fuel poverty will decrease.
- This decrease does not mean that there won't be many households struggling to pay their fuel bills, despite not officially being considered fuel poor under the revised definition.

- A key impact for the Scottish Borders that this revised definition presents is the potential for the definition, and the use of a UK wide Minimum Income Standard, to not represent fully the remote rural parts of our area. There is risk that the revised definition, and the use of a UK-wide Minimum Income Standard, fails to adequately reflect the nature of fuel poverty in the remote rural parts of our region.
- Our view is that we will monitor this concern closely in the coming years to understand this situation better and we hope that the Scottish Government will remain aware of this concern also.

**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?**

- We agree with the provision requiring Scottish Government to publish a fuel poverty Strategy and are also in agreement with the intentions of the Strategy (outlined in Section 3).
- We again urge the Scottish Government to consider explicitly the characteristics of those in fuel poverty (or who have been in fuel poverty under the previous definition) in rural and remote rural households, when developing the Strategy to ensure that it is relevant for all households.
- We agree with the consultation requirements – in particular the need for Scottish Government to consult with individuals who are living, or have lived, in fuel poverty – ensuring that they consult with individuals that reside in remote rural areas too.

**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?**

- We have no further view at this stage on the draft, but would value an opportunity to engage in the development of the Strategy.

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

- We have no further view on the reporting requirements.

Paul Gilbert  
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