

**LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE**

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

**SUBMISSION FROM RURAL AND ISLANDS HOUSING ASSOCIATION FORUM  
(RIHAF)**

***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 applaud the Government's desire to tackle Fuel Poverty and believe that a statutory target has the ability to focus minds and delivery. We believe that the 2040 target is not ambitious enough and think this should be reconsidered and reduced to 2030.

While we believe that the 5% target is ambitious we believe that it takes a realistic position in that the total elimination of Fuel Poverty is neither achievable or totally within the power of the Government.

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

We welcome the move towards the use of the MIS in the proposed new definition of fuel poverty. However, we are concerned about the use of the UK MIS and the impact this will have to accurately measure fuel poverty in rural areas.

The Rural and Islands Housing Association Forum (RIHAF) were the original funding body who sought a remote and rural measure of MIS for Scotland. In partnership with HIE (and later, further partners including Highland Council, Orkney Islands Council, Shetland Islands Council, Comhairle nan Eilean Siar and others) it was agreed to appoint Professor Donald Hirsch to calculate how much it costs people to live at a minimum acceptable level in remote rural Scotland. We therefore agree with the findings of the Independent Panel, that the Remote and Rural MIS should be used in place of the UK MIS.

We remind the committee that within the consultation document the Ministerial Foreword stated that: "Everyone should have enough money in their pocket to pay the essential costs of housing and energy and **still be able to lead a healthy and decent life.**" We are therefore surprised that the Remote and Rural MIS is not used to assess whether the households in these regions will be left with sufficient income to lead a healthy decent life.

It has been argued that the use of BREDEM will resolve the rural question, however, while BREDEM does take into account the cost of fuel in rural areas it does not answer the fundamental question as to whether the households are able to afford a decent life after meeting the costs of heating the home. That is the purpose of the Minimum Income Standard and the failure to use the Remote and Rural MIS means that the real extent of fuel poverty (and the objectives of the Bill) will be under represented. This is an important distinction as one is solely related to the level of fuel poverty while the other measures whether “the household’s ... net income is insufficient to maintain an acceptable standard of living” as is an aim of the Bill.

We support and acknowledge the views of the expert panel that the MIS must reflect the remote, rural households. It is worth bearing in mind the particular problems facing rural Scotland when it comes to energy efficiency and fuel poverty. The lack of access to mains gas and the increased electricity tariff in the north of Scotland under the hydro benefit scheme mean that household in rural area cannot be already at a disadvantage as they are unable to access the cheapest deals available. This, in conjunction with the severe climate faced, particularly in the North of Scotland, results in achieving affordable heat for households being very difficult and costly.

**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 provisions requiring a Fuel Poverty Strategy to be published and for the need for full consultation.

We would further ask that an Islands Impact Assessment is carried out as part of the consultation, as required by the Islands (Scotland) Act 2018, to ensure our rural islands are not negatively impacted by the Bill. We believe that this must be done prior to the Bill being considered by the Parliament at Stage 3.

**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 principal aim of a new fuel poverty strategy should be to ensure that *vulnerable people* are a) identified and b) are then guaranteed to receive all the personalised help and support they need to resolve their fuel poverty problems satisfactorily. This is particularly relevant in rural areas where access to support is more difficult and costly than in an urban context.

A good example of this work in practice is at Lochalsch and Skye Housing Association which has been successful in addressing fuel poverty on an individual household basis. Face-to-face projects such as this are critical in managing fuel poverty and must be properly funded. In rural areas where populations are more dispersed it must be recognised that these costs will be higher in more rural areas.

We have real concerns that the rollout of this definition and strategy will under represent the real extent of fuel poverty in rural Scotland resulting in resources being diverted away from the parts of Scotland where fuel poverty is highest and solutions are more complex and resource intensive.

***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 Scottish Government should report to Parliament on an annual basis the progress it has made toward its target. We recognise this would be time consuming and expensive so suggest an interim report is produced annually with full review and reports every 5 years.