



Environmental Sustainability and the Competition and Consumer Law Regimes

THE CONSUMER COUNCIL RESPONSE

- 1. THE CONSUMER COUNCIL**
- 2. THE CONSUMER COUNCIL FOCUS ON SUSTAINABILITY**
- 3. THE ESSENTIAL ROLE OF CONSUMERS IN ACHIEVEING NET ZERO**
- 4. RESPONSE TO CONSULTATION QUESTIONS**
 - 4.1 [Question 10] Does the current consumer protection law framework constrain or frustrate initiatives that might support the UK's Net Zero and sustainability goals?**
 - 4.2 [Question 12] What other opportunities are there to develop the consumer protection law framework to help to achieve the UK's Net Zero and sustainability goals?**
 - 4.3 [Question 13] To what extent should the consumer protection law framework be prescriptive, for example, by mandating provision of particular forms of information, or by prohibiting particular types of conduct, in order to help to achieve the UK's Net Zero and sustainability goals?**
 - 4.4 [Question 14] How far should the consumer protection law framework go to address: (a) the planned obsolescence of products; and/or (b) commercial practices which promote over-consumption?**
 - 4.5 [Question 18] What other considerations should the CMA take into account in responding to the Secretary of State's request for advice?**

The Consumer Council for Northern Ireland response to the CMA Environmental Sustainability and the Competition and Consumer Law Regimes Call for Inputs.

10 November 2021

1. THE CONSUMER COUNCIL

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.

The Consumer Council has specific statutory duties in relation to energy, postal services, transport, and water and sewerage. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

Consumer Principles

We use the eight consumer principles shown in Figure 1 as a framework that asks important questions about service design and delivery, consumer impact and how services should look and feel to the consumer, and that helps assess regulatory decisions from a consumer perspective.



Figure 1: The Consumer Council's Eight Consumer Principles

The consumer principles also establish a common language that all stakeholders (Government, Regulator, Consumer Advisory Body, and the Company) can use to meaningfully and constructively engage with consumers to develop trust and a better understanding about how the competition and consumer protection regimes can better support the UK's Net Zero environmental and sustainability goals (including climate adaptation).

The Consumer Council welcomes the opportunity to contribute to the Competition and Markets Authority (CMA) Call for Inputs to consider how competition and consumer protection regimes can better support the UK's Net Zero and sustainability goals.

Framework for Response

The Council of European Energy Regulators (CEER) in their 2030 Vision for Energy Consumers, present a **Consumer Protection Model** that can help assesses how consumers can be protected within the energy transition and journey to net-zero.

To frame the response to the CMA 'Call for Inputs' the Consumer Council has applied the CEER Consumer Protection Model to assess how the current consumer protection regime can better support the UK's Net Zero and sustainability goals.

Each question posed in relation to consumer protection has been considered through a lens of Affordability, Simplicity, Protection, Inclusiveness, Reliability and Empowerment. For each question within this response we have included a table setting out the Consumer Council's view of the key consumer protection issues to be considered. The areas deemed most important are highlighted dark green, those that have relevance are coded light green and those with no direct relevance are coded grey. This is outlined in Figure 2 below.

Consumer Protection Focus					
Affordability	Simplicity	Protection	Inclusiveness	Reliability	Empowerment

Fig 2 – CEER Consumer Protection Model Focus Areas

2. THE CONSUMER COUNCIL FOCUS ON SUSTAINABILITY

A UK target of net-zero emissions by 2050 has been adopted by Government which is now legally committed to delivering it. The Consumer Council is unambiguous in its view that achieving this target is essential for long-term consumer protection.

Decarbonisation is one of four consumer priorities we have identified in our Corporate Plan 2021- 2024, which we will address through continuing work programmes. In addition, as detailed in our Corporate Responsibility and Sustainability Strategy (2016 – 2021), the Consumer Council maintains a focus on the needs of current and future consumers, whilst promoting responsible consumerism and sustainable consumption.

The Consumer Council recognises the importance of collaboration between Government, stakeholders and policy makers to ensure the development of a consumer protection framework that enables the innovation, change and developments necessary to achieve our shared 2050 goal. However, as a guiding principle it must be accepted that any change to consumer protection frameworks must not result in the diminution of existing protections for consumers.

As an organisation with a statutory responsibility to represent consumer interests we engage with consumers to understand their awareness and willingness to adopt sustainable behaviours. In addition, we examine barriers in terms of policy, practice and protections which may prevent consumers from fully contributing to the net zero journey. These insights underpin our response to the 'Call for Inputs', and we look forward to ongoing partnership with CMA and other stakeholders to ensure consumers can feel confident, empowered and protected in taking sustainable decisions.

3. THE ESSENTIAL ROLE OF CONSUMERS IN ACHIEVEING NET ZERO

On a global basis, household consumption accounts for almost three-quarters of greenhouse gas emissions¹. So, there can be no doubt achieving net-zero will present a significant challenge requiring engagement and contribution from all consumers.

Progress has been made in driving down emissions. The UK has reduced greenhouse gas emissions by 40% since 1990, but progress has come largely from actions that have not involved consumers changing their behaviour it is mainly due to decarbonisation of the electricity supply². Given the ambition to reduce UK emissions to net zero there is an urgent need for consumers to lead the way and play a much more significant role.

¹ Behaviour change, public engagement and Net Zero. A report for the Committee on Climate Change, Oct2019

² *ibid*

Consumers appear willing to undertake this role and are increasingly interested in buying products which minimise harm to, or have a positive effect on, the environment. A large proportion of consumers (over 50%) take environmental considerations into account when making a purchasing decision.³ Research conducted by the Institute of Customer Service⁴ demonstrates 60% of consumers feel that they should do more to help the environment, and more than half of consumers said that in the next 5 years, environmental sustainability will either remain or become one of their highest priorities when making purchasing decisions.

That said, our research also demonstrates that consumers are looking for leadership and practical support and information to help them make environmentally sustainable choices.

Household consumption is the largest element of expenditure across the economy, accounting for 58% of the total in 2020⁵. Therefore, supporting and protecting consumers to make sustainable choices, reduce over-consumption and increase the lifecycle of goods and services will be essential to achieving net-zero.

³ Making Environmental Claims: A literature Review. CMA, 2021

⁴ Green Goes Mainstream? Customer service and the green agenda. Institute of Customer Service (2020)

⁵ Components of GDP: Key Economic Indicators. House of Commons Library Report, 13 October 2021

4. Question 10: Does the current consumer protection law framework constrain or frustrate initiatives that might support the UK's Net Zero and sustainability goals?

Consumer Protections Focus					
Affordability	Simplicity	Protection	Inclusiveness	Reliability	Empowerment

Historically, UK consumers have enjoyed a strong level of consumer protection through a wide range of legislative and statutory frameworks to ensure they can participate with confidence across goods, services and digital markets.

In recognition of the essential role consumers will play in achieving net-zero, it is right to assess whether the existing consumer law framework is sufficient and future proofed to ensure consumers are not placed at risk as markets change and develop in response to sustainability objectives.

As the current consumer protection framework is silent on issues relating to climate change, net zero or sustainability it could be argued that this does not constrain or frustrate initiatives that might support net-zero. However, by remaining silent, the opportunity to be proactive, build consumer confidence, and ensure consumers are informed and feel protected in making their contribution to net-zero will be lost.

It is well accepted that consumers require protection, redress and support when they suffer loss or detriment due to poor practices, or inappropriate actions by traders. However, a consumer protection framework which seeks to *put things right when they go wrong* should really be a minimum.

There should be a proactive focus on ensuring consumer interests are inherent and safeguarded within markets. Given the importance of encouraging and nudging consumers towards taking positive and proactive decision regarding net zero they must have confidence that markets, especially in terms of new technologies, have their interests well served and protected.

It is likely the journey to net-zero will see significant changes to existing consumer markets, with new and novel markets emerging and new ways for consumers to engage. No doubt this will provide exciting opportunities for consumers, but it is essential consumer protection frameworks anticipate and keep pace with developments across consumer markets ensuring appropriate regulation and protection is in place. While achieving net zero is essential for long-term consumer protection, reaching the target must not create undue consumer detriment.

Effective regulation which places the consumer at the centre is essential to supporting and enabling the transition to net-zero. With innovation across energy markets, new technologies and new opportunities for consumers to engage there is much to be positive about. However, with the scale and pace of change it will be an ongoing challenge to ensure appropriate regulatory frameworks are in place to protect customers.

Regulators must be provided with adequate resources to keep ahead of change, shape markets in consumer interests and to intervene early, if required, in problem markets. It is important regulators coalesce to identify gaps in the current regulatory system and take mitigating action so markets, products and services can work for all consumers irrespective of individual circumstance. Initiatives such as the Global Regulatory Accelerator⁶ present an important opportunity for regulators to learn from each other's experiences and develop new approaches for the energy systems of the future.

Regulatory framework changes must not be solely about enabling technological change. Consideration must also be given to measures that lead to market change in the interests of consumer protection. For example, consideration could be given to the implementation of statutory and regulatory change to enable policy makers to adjust fuel pricing to reflect consumers' ability to pay.

To drive the change required to achieve net zero, consumers need access to accurate and complete information. This will ensure they feel confident about making sustainable decisions whilst having confidence that there is comprehensive protection against misleading claims, poor practice or inferior products. Ensuring that robust protection and enforcement structures are in place is essential for consumer confidence and the achievement of our net zero goal.

Low carbon choices will require consumers to make complex and often costly decisions and often in evolving, new markets, leaving them vulnerable without adequate consumer protections. People therefore need to be supported by a framework of effective consumer rights and protections. They need to easily access the products and services that are right for them, with reassurance that they be effective and safe – and that they can trust the professionals and tradespeople who advise them and where needed refit, repair or install. If things should go wrong, they must have a simple, but reliable route to effective redress.

⁶ Global "Regulatory Accelerator" to speed up clean energy transition, OFGEM (Press Release), 3rd November 2021

- **Question 12: What other opportunities are there to develop the consumer protection law framework to help to achieve the UK's Net Zero and sustainability goals?**

Consumer Protections Focus					
Affordability	Simplicity	Protection	Inclusiveness	Reliability	Empowerment

Legislation and regulatory protections are essential to ensure consumers are confident to change their behaviour and contribute to net-zero objectives. However, beyond legal frameworks proactive consumer engagement, information and support is required to inspire and encourage consumers maximise their contribution to achieving net-zero.

A greater examination is required of the interplay between consumer contract law and environmental / sustainability law. Currently, consumer protection frameworks predominantly focus on the consumer interaction with the purchase process, such as the provision of information, the sale of goods and services, and the right to seek remedial action if things go wrong. Although sustainability is enshrined in environmental law, attempts to establish a solid basis for it in consumer law are still limited. There should be action to ensure existing consumer contract law focuses more heavily on sustainability given the beneficial impact this will have in driving consumer behaviour towards responsible purchasing decisions, and to consumers feeling protected.

Government policy should also reinforce and enable consumers shift to low carbon choices. Many changes can be small, incremental and easy to make but larger changes, which can have a significant impact on household emissions, such as renewable heating systems or electric vehicles are a considered purchasing decision requiring a significant financial outlay. It is essential policy provides sufficient consumer protection within these new markets to instil confidence but also seek to remove financial and other barriers which frustrate shifts to low carbon household choices.

Net zero will not be achieved unless there is a fair and just energy transition. Of the 29 million existing homes across the UK, at least 19 million still need to be made low carbon, low-energy and resilient to a changing climate⁷. The energy transition will place significant responsibility on consumers and necessitate behavioural change. It will require consumers to make lifestyle changes, adapt to new technologies, and accept the disruption of installing new heating and energy efficiency measures in their homes. These are significant requirements being placed upon consumers and requirements that consumers themselves do not yet fully understand or accept.

⁷ The sixth carbon budget, The UK's path to Net Zero, Climate Change Committee, December 2020

Research commissioned by the Consumer Council on Consumer Attitudes on the Energy Transition highlights that awareness of the energy transition is low and there are numerous significant barriers to consumers switching to greener home energy solutions; notably cost, lack of awareness, and little enthusiasm for changing lifestyle⁸.

The energy transition will create many new challenges for consumers, especially in Northern Ireland, where there is a higher level of fuel poverty, a relatively rural population, and a higher dependence on fossil fuel imports especially home heating oil which remains unregulated.

The CMA recognises the specific challenges Northern Ireland faces in efforts to decarbonise, especially in supporting and protecting 'off-grid' households. In their response to the Department for Economy call for evidence on the Energy Strategy, the CMA highlight that off-grid households remain at a greater risk of spikes in fuel poverty and face significant difficulties in switching to new fuel types. This includes high up-front costs when replacing existing technology and infrastructure and the degree to which these households can engage with energy markets.

Beyond issues relating to cost and engagement, the CMA confirm that off-grid energy consumers do not enjoy the same level of regulatory protection as provided to natural gas and electricity consumers. The CMA stress the importance of moving consumers to new forms of energy, to reduce carbon emissions but also to ensure they benefit from the protections currently available to on-grid households. Given the rural nature of Northern Ireland it is likely many households will remain 'off-grid' through, and potentially after, the transition to a lower carbon economy so it is essential they are protected by a strong regulatory framework.

It is imperative that the energy transition and journey to net-zero are fair for all consumers. It must not be the case that those who have the capacity to adapt to and adopt new technology reap the cost and lifestyle benefits, while others, such as consumers in vulnerable circumstances, are left to languish on inefficient outdated technology, struggle to adapt to new technologies, or are left to pick up infrastructural costs.

Consumer protection must be fit for purpose for the rapidly expanding low carbon, energy efficiency and smart technology markets. Inadequate protections mean when installers go bust, people find it difficult to fix problems and are left with guarantees and warranties that are useless or difficult to enforce. Furthermore, if protections for the net-zero transition don't keep up with the pace of change it may attract scammers and

⁸ Northern Ireland Consumer Views Attitudes on Energy Transition. The Consumer Council, July 2021

rogue traders seeking to take advantage of limited consumer proficiency within these new markets.

Consumer confidence can be slow to build and quick to damage. It is essential consumers are not exposed to detriment due to sharp selling practices, inaccurate information, scams or mis-selling. Consumers must be protected by being provided with high quality information, advice, wrap-around support, and certainty.

Information provided to consumers should be easy to digest and clear to allow them to make appropriate choices around price, products, technology and contractual relationships. It is essential information is provided by an independent and trusted sources to ensure consumers are empowered to learn, adapt, and make the best use of the new technologies. Vulnerable households will need to be proactively identified as they will require additional support.

Consumer protection frameworks must be responsive and adaptive to change and develop alongside the journey to net-zero, by being responsive and adaptive to change. This may need the revision of existing consumer protection structures to ensure consumers are adequately protected when interacting with installers, technology manufacturers and energy suppliers and emerging sectors.

Technology is moving at a rapid pace and the use of personal data is a key enabler to those advances. Safeguarding data, giving people control, and making it easy to access and change their preferences, will ensure people can engage with confidence in the energy market.

It is likely with new technologies, time of use tariffs, and smart appliances will lead to a growth in the amount of personal data being collected about individual consumer's lifestyles, daily habits and energy consumption. Our personal data is valuable, and we should be able to realise that value and benefit from it. Any changes to the way that personal data is collected, accessed or used should be closely examined and with careful consideration of the consumer impact. There should be a robust framework that builds in consumer protections and guarantees people clarity about how and why their data is used.

Question 13: To what extent should the consumer protection law framework be prescriptive, for example, by mandating provision of particular forms of information, or by prohibiting particular types of conduct, in order to help to achieve the UK's Net Zero and sustainability goals?

Consumer Protections Focus					
Affordability	Simplicity	Protection	Inclusiveness	Reliability	Empowerment

Improving the provision of information to support consumers in the adoption of sustainable behaviours is essential but must not be at the expense of consumer protection frameworks. Within new and novel markets the protection of consumers' rights must be a priority. So too providing consumers access to appropriate information in order to enable them to make responsible decisions.

To encourage responsible consumerism there is a need to ensure consumers are provided with reliable information on the sustainability characteristics of goods and services they purchase, whilst avoiding information overload or confusing (mixed) messages.

The Consumer Council would support action to promote accurate and reliable environmental or sustainability claims. It is essential consumers have confidence in information provided by businesses as they try to make sustainable choices. This would also benefit those companies who are making genuine efforts to offer products or services that support environmental goals.

Research undertaken by Which?⁹ highlights the influence environmental claims can have on consumers' decisions. Around 40 per cent of consumers have made a purchasing decision based on sustainability considerations. However, it is not straightforward for consumers to compare environmental claims due to multiple environmental standards, a lack of agreed terms and definitions and misleading 'green' claims which can all lead to consumer confusion and frustration.

Around half of European consumers think it is not easy to differentiate between environmentally friendly and other products and only about half of them trust producers' claims about environmental performance.¹⁰ This position is reinforced by Which? who state misleading green claims are a concern for UK consumers, with more

⁹ Supporting consumers in the transition to net zero. Which?, October 2021

¹⁰ Consumer testing of alternatives for communicating the Environmental Footprint profile of products. European Commission, Sept 2019

than half (55 per cent), who had made a sustainable purchase stating they did not believe the green claims of companies at least some of the time.

Consideration should be given as to whether the existing consumer protection framework provides sufficient clarity on the information and claims that can be presented in relation to the environmental performance of a product. Currently consumer protection law does not prevent businesses from making environmental claims about their products and services, provided they do not mislead consumers.

Given the limited information provided, inconsistency and low level of consumer understanding it could be argued that a requirement not to mislead does not go far enough. Access to consistent information on the environmental characteristics of products, as well supporting comparability of information is key to supporting consumers take decisions that will contribute to net-zero objectives.

Consumers need to be protected against information that is not true or presented in a confusing or misleading way to give the impression that a product is more environmentally sound (i.e. greenwashing). Companies making 'green claims' should substantiate these against a standard methodology to assess their impact on the environment. This will create trust among the consumers and other relevant stakeholders and lead to the creation of a level playing field.

Not being able to compare environmental claims, a lack of trust in green claims, or indeed misleading green claims has the potential to cause detriment to consumers trying to do the right thing. Therefore, we urge CMA to work with Government and other stakeholders to consider actions needed to tackle these issues, including an assessment of whether further specific regulation is required.

To address the issue regarding information it is important not to add to the confusion. It is difficult for consumers, and indeed businesses, to make sense of the many environmental labels and initiatives on the environmental performance of products and companies. Action must be focused on improving the consistency and simplicity of environmental claims. Ultimately the objective should be to ensure information provided in relation to environmental claims are credible, consistent, understood, recognised and valued by consumers.

- **Question 14: How far should the consumer protection law framework go to address: (a) the planned obsolescence of products; and/or (b) commercial practices which promote over-consumption?**

Consumer Protections Focus					
Affordability	Simplicity	Protection	Inclusiveness	Reliability	Empowerment

Planned obsolescence is becoming a source of increasing consumer concern with many products not living up to what consumers reasonably expect. Consumers are understandably frustrated when manufacturers shorten the lifespan of products and force them into buying early replacements.

The recent introduction of the Right to Repair law should help to extend the life cycle of a range of devices and appliances by up to ten years. According to Government, the Right to Repair law will reduce the 1.5 million tonnes of electrical waste generated each year. This is to be welcome but requiring companies to provide consumers with more information about repair, and the cost of doing so, and extending the 'repair list' to beyond washing machines, washer-dryers, dishwashers, refrigerators and TVs would deliver an even greater impact for consumers and the environment.

Although heating systems sit outside the 'repair list' it is important to ensure that spare parts and repairs are available for heating systems that may be installed now or in the future. Consumers install a new system with the expectation that it will continue to work efficiently for many years so ensuring spare parts and repairs are available, even if the product is discontinued, is essential.

It is clear consumers can often be confused regarding their home heating options and unsure about the type of new heating system to install. It is critical consumers have access to expert, independent advice, and guidance to support their decision-making process. Expert advice should also consider energy efficiency, reducing energy use and minimising the need for heating and cooling (fabric first).

Even with this support it is likely that consumers will require direct contact with manufacturers, installers and traders. There should be a requirement placed upon the heating industry to fully disclose information regarding the lifespan of any heating system, planned obsolescence and availability of spares and repair. Consumers must be informed if a heating system (or fuel type on which it operates) is due to be removed from sale in the market.

A key consumer policy issue is how to promote responsible and sensible consumer behaviour in terms of sustainability. There is rightly a focus on shifting to a low carbon future, but circularity and reducing over-consumption also must be a priority. Less

resource use and less waste are desirable end goals in their own regard but will also help deliver a low carbon future.

It is recognised that consumers are increasingly interested in the conditions under which goods are produced and how services are provided. However, ensuring products are designed with a focus on prolonging use, repair, reuse, and recycling will be essential to improve a products life cycle, support sustainable choices and reduce over-consumption.

A *'throw away'* use and dispose culture is evident across a wide range of consumer markets. Many products breakdown too quickly, cannot be easily reused, repaired or recycled, and many are made for single use only. The Consumer Council believes there should be a greater responsibility placed upon producers to increase focus on circular products and supporting action to prevent products becoming waste, for example through repair services or spare parts availability.

Empowering consumers to demand products produced by sustainable methods, to expect increased product lifecycle and durability, and to require (substantiated) information on environmental claims will be critical to changing supply chains and promoting a circular economy.

There's a strong belief amongst consumers that government and businesses are not doing enough to tackle the barriers to making lower carbon choices. Half of people (51%) want the government to be more ambitious and ensure retailers and manufacturers support consumers to do the right thing¹¹.

The Consumer Council welcomes the Northern Ireland Department for the Economy's intention to develop a Circular Economy Strategic Framework to set a clear vision for how Northern Ireland can transition towards a circular economy. As a guide The EU Circular Economy Action Plan¹² details a range of actions to make sustainable products and services the norm and transform consumption patterns so that less waste is produced in the first place. Examples of relevant actions include:

- ensuring that consumers receive trustworthy and relevant information on products at the point of sale, including on their lifespan and on the availability of repair services, spare parts and repair manuals
- strengthening consumer protection against green washing and premature obsolescence, setting minimum requirements for sustainability labels and logos

¹¹ Supporting consumers in the transition to net zero. Which?, October 2021

¹² Circular Economy Action Plan. European Commission, July 2020

- focusing on policies and strategies that incentivise and enable sustainable, circular and responsible behaviours
- Incentivise renewable and circular products and activities such as repair or remanufacturing through for example the reduction or removal of VAT on repair services.

When purchasing new products, consumers should be informed as to how long different products should last, if used and maintained properly. Information should also be available regarding the reparability of goods as well as availability and costs of spare parts. Without such information consumers are not enabled to reward manufacturers who produce long lasting and repairable goods.

• **Question 18: What other considerations should the CMA take into account in responding to the Secretary of State’s request for advice?**

Consumer Protections Focus					
Affordability	Simplicity	Protection	Inclusiveness	Reliability	Empowerment

People must be given the chance to act responsibly and sustainably, and they must be equipped with the knowledge and information to enable their contribution to net-zero.

If we are to achieve a just and fair transition, consumer behavioural change cannot be demanded without first providing appropriate support and incentives to consumers. Lower-carbon choices need to be seen not only as important and urgent but also normal, easy and in alignment with other day-to-day concerns, such as household budgets and the rising cost of living.

The need for change in consumer behaviour in terms of sustainable consumption, transport, and energy use to deliver net-zero will require greater engagement, action and support for all consumers. However, particular attention should be paid to issues which impact on low-income consumers and disadvantaged communities, as well as concerns specific to Northern Ireland – some as the issues detailed below:

Vulnerability

Vulnerable consumers will require additional support to adapt to the behavioural change and technologies required to achieve net-zero. If we are to ensure a just and fair transition vulnerable consumers will require much more support in the form of technical guidance, financial support and wrap-around assistance.

The energy transition may also lead to the emergence of new vulnerable groups. This could be due to a variety of factors including rising fuel costs, more complex technology, domestic heat sources becoming obsolete, inadequate consumer information, a lack of advice, and a lack of appropriate financial support. Work should be undertaken now, and kept under review, to identify potentially vulnerable groups under a variety of risk scenarios. This would enable early introduction of mitigating measures to prevent more people becoming vulnerable.

Fuel Poverty

It is critically important that as we decarbonise our energy systems, energy remains affordable for all Northern Ireland consumers. Northern Ireland’s high level of fuel

poverty, 22% compared to 10% in England¹³, which will no doubt increase due to recent energy price rises, presents a significant challenge.

In driving forward towards a low carbon future there is a need to recognise that many fuel poor households will be unable to participate in the transition without support. They should not be penalised for being unable to do so, and should not miss out on the opportunities and benefits either. They need supported financially and in terms of practical access to low carbon living solutions.

This will necessitate an in-depth consideration of support required for fuel poor homes when introducing new policies, financial interventions, and technologies to ensure they do not result in an unfair or disproportionate financial burden and deliver positive outcomes by eliminating fuel poverty.

Regionality (Rurality)

Northern Ireland has a relatively rural population and according to DAERA, some 37% of the population live in rural areas. This will present challenges in terms of decarbonisation especially in relation to transport, home heat and supporting the role of agriculture in contributing to net-zero.

Northern Ireland, given its rural profile, is highly car dependent, with over 70% of all journeys made by car, and 82% of the total distance travelled per person is by car. Furthermore, Northern Ireland is lagging behind the rest of the UK in the adoption of EVs. In 2018 just over 3,600 (0.3%) of vehicles in Northern Ireland were ULEVs, compared to 0.5% in the United Kingdom

Around 68% of households use home heating oil as their heating source, and it is essential that consumers have access to clear, impartial, comprehensive and free advice regarding alternative home heating options.

Ensuring a focus on the specific needs of rural communities will be essential to support all consumers play their role in contributing to net-zero.

10 November 2021

¹³ Department for Business, Energy & Industrial Strategy Annual Fuel Poverty Statistics in England, 2020 (2018 data), 30 April 2020

