



CONSULTATION RESPONSE

Submitted: January 2025 | Contact: shannon.montgomery@nea.org.uk

Department of Agriculture, Environment and Rural Affairs: Consultation on the establishment of a Just Transition Commission

About National Energy Action (NEA)

National Energy Action (NEA) is the national fuel poverty charity, working across England, Wales, and Northern Ireland to ensure that everyone can afford to live in a warm, safe, and healthy home. In Northern Ireland, we chair the [NI Fuel Poverty Coalition](#) and serve as the secretariat to the [All-Party Group on Fuel Poverty](#).

NEA NI works to overcome the causes and effects of fuel poverty in four main ways. We provide **advice and support** to people struggling to heat their homes affordably; we **campaign and advocate** for policy and regulation to protect the most vulnerable and end fuel poverty; we carry out **research** to raise awareness and find solutions; and we provide **accredited training and qualifications** to improve standards in energy advice.

General Comments

NEA NI welcomes the opportunity to respond to this consultation on the establishment of a Just Transition Commission (the Commission). We support the creation of an Advisory Non-Departmental Public Body with



clear oversight and advisory functions. Specifically, we value the Commission's proposed roles in overseeing the implementation of the Just Transition elements of the *Climate Change Act (Northern Ireland) 2022* and in providing independent advice to ensure departmental policies, strategies, and plans align with Just Transition principles. Furthermore, the Commission can play a vital role in achieving a coordinated approach to decarbonisation across departments.

NEA NI has long advocated for a Just Transition to net zero, highlighting the importance of supporting low-income and vulnerable households throughout the process. Achieving a Just Transition requires empowering these households to benefit from decarbonisation opportunities while protecting them from disproportionate costs. The transition must be an inclusive process that protects the most vulnerable households and addresses fuel poverty.

Consultation Questions

Q1. Do you agree with the proposal that the Commission should be established as an Advisory Non-Departmental Public Body with the chair and its members recruited in line with the guidance issued by the Commissioner for Public Appointments.

Yes.

NEA NI supports the establishment of the Just Transition Commission as an Advisory Non-Departmental Public Body, as this structure will provide the independence and credibility necessary to effectively achieve its oversight and advisory functions. The chair and its members should be recruited in line with CPANI guidance to ensure these appointments are made in ways that are open, transparent and merit-based.

Q2. Do you agree the Commission membership should be between 7-20 members?

No.



The Commission should include more than the minimum of seven members specified in the *Climate Change Act (Northern Ireland) 2022*. While the Act outlines that membership must include representatives from agriculture, fisheries, academia, trade unions, youth groups, civic society, and environmental groups, NEA NI strongly advocates for the inclusion of additional sectors that are critical to achieving a Just Transition. In particular, we recommend expanding the Commission’s membership to include representation from the Energy Sector, increasing the minimum membership above seven.

The inclusion of the Energy Sector is essential given the profound changes required to meet net zero targets. Decarbonisation will require significant changes in how households heat their homes and manage their energy use. A comprehensive understanding of energy systems, consumer behaviours, and energy affordability is crucial to ensuring the success of this transition.

Furthermore, NEA NI strongly urges representation from fuel poverty sector, either as full members or on an ad-hoc basis. Such representation is critical to ensuring that the voices and lived experiences of those most affected by rising energy costs are heard and informs the Commission’s oversight and advice.

Q9. Should the Commission include representation from the Energy sector?

Yes.

The inclusion of the Energy sector is essential given the profound changes required to meet NI’s net zero targets. The transition to a low-carbon economy will profoundly affect how households heat their homes, consume energy, and adopt new technologies. Representation from the Energy sector can provide valuable insight into energy systems, the challenges of decarbonisation, consumer behaviours, and the critical need to maintain affordability throughout the transition. Their expertise will help ensure the Commission’s oversight and advice is focused on practical and equitable solutions, particularly for low-income and vulnerable households.



The transition to decarbonisation represents a fundamental shift in Northern Ireland's energy landscape, requiring significant behavioural and infrastructural changes. Currently 68% of our households rely on domestic home heating oil - compared to just 4% of the UK as a whole¹. This highlights the scale of the challenge, as many households will be required to learn new skills and adopt new behaviours to make efficient use of emerging technologies. Provisions are needed to support this change and make the transition as straightforward as possible for energy users.

Research by the Consumer Council Northern Ireland has suggested there remains low awareness of the energy transition among domestic consumers and underscores the need for consumer education and support. For example:

- **Low Awareness:** Three in ten consumers reported having no understanding of the term "Net Zero", while only 54% were aware of the Executive's commitment to achieving net zero by 2050.²
- **Desire for Information:** Almost six out of ten (58%) consumers said they would like to receive more information on the benefits of decarbonisation and energy transition.³

It is imperative that the Commission advises NI departments to enhance consumer knowledge about what is required of them and why. Clear, accessible information, advice, and support are crucial to ensuring public understanding and participation in the transition.

Furthermore, as energy systems change, there is a significant risk that the upfront costs of renewable energy systems and decarbonisation will disproportionately burden consumers, especially those on low incomes. For example, currently renewable energy generation requires significant upfront investment on the part of a householder. Even where this cost is covered by existing subsidies it is at best part funded, meaning households must find a substantial amount of money upfront to access

¹ Department for the Economy, (2022). '[Energy in Northern Ireland 2022](#)', pp. 110.

² Consumer Council for Northern Ireland, (2023). '[Attitudes to the Energy Transition](#)'.

³ Consumer Council for Northern Ireland, (2023). '[Research on the impact of the energy crisis on affordability and the impact of energy transition on consumers](#)'.



the low carbon alternatives. This presents an insurmountable barrier for lower-income and vulnerable households. Consumer Council NI research has highlighted that cost is a primary concern for consumers regarding decarbonisation.⁴

Q11. Are there any other sectors in addition to the Transport, Energy, Finance and those listed in 37(4) of the Act that should be represented on the Commission – and if so, please provide reasons for your answer.

Yes.

NEA NI strongly advocates for representation from the fuel poverty sector within the Commission, either as full members or on an ad-hoc basis. Their representation is vital to ensure that the voices and lived experiences of those most affected by rising energy costs are heard and considered in the Commission's oversight and advisory functions. Including fuel poverty organisations will help the Commission stay informed about the specific challenges faced by fuel-poor households, such as affordability and energy efficiency issues.

Recent polling commissioned by NEA NI revealed that 40% of households in Northern Ireland are spending more than 10% of their income on energy⁵, a threshold that meets the Department for Communities' definition of fuel poverty⁶. This alarming statistic underscores the pressing need to address fuel poverty as part of the Commission's work. The principles of a Just Transition should be explicitly applied to ensure that the transition to a low-carbon economy does not worsen the difficulties already faced by low-income and vulnerable households struggling with high energy costs.

Q12. Do you agree the Commission should have a power to establish Ad-Hoc Committees or working groups to secure

⁴ Consumer Council for Northern Ireland, (2023). ['Consumer attitudes to protection during energy decarbonisation'](#).

⁵ National Energy Action, (2024). ['LucidTalk – NEA NI: September 2024 – Northern Ireland \(NI\) Attitudinal Poll'](#).

⁶ "A household is said to be in fuel poverty if it needs to spend more than 10 per cent of its income on energy costs." – Department for Communities, (2024). ['Fuel Poverty'](#).



additional knowledge or expertise that may not be available with the Commission.

Yes.

NEA NI fully supports the Commission's ability to establish ad-hoc committees or working groups to access additional knowledge and expertise that may not be available within the Commission itself. This approach will allow the Commission to address specific issues more effectively and ensure that it receives comprehensive and informed advice on a wide range of topics.

However, we encourage the Commission to engage with existing groups where possible to avoid duplication and minimise the pressure on organisations that are already involved in multiple working groups. For example, the Commission could benefit from the insights of the Northern Ireland Fuel Poverty Coalition⁷, Utility Regulator's Consumer Protection Advisory Group (CPAG), the Sustainable Energy Communities NI (SEC NI)⁸ Steering Group, and the Housing Executive's Home Energy Conservation Authority Panel (HECA).

NEA NI would be pleased to engage further with the Department to explore how we can contribute to the Commission's work, especially in areas related to fuel poverty, energy affordability, and the challenges faced by vulnerable consumers.

Q13. What do you think the key initial priorities should be for the Commission?

Addressing Fuel Poverty

Northern Ireland is facing both a climate emergency and a fuel poverty crisis. Rather than viewing these as opposing challenges, it is crucial that the transition to net zero helps lift households out of fuel poverty. A Just Transition is essential to ensure that the costs and benefits of decarbonisation are fairly shared across society. As noted in the

⁷ For more information visit: <https://fuelpovertyni.org/>

⁸ For more information visit: [Sustainable Energy Communities NI \(SEC NI\) | Advice NI](#)



Department for Communities' current consultation on a draft Fuel Poverty Strategy, reducing fuel poverty contributes to a Just Transition by focusing on actions to eliminate poverty, inequality, and social deprivation.⁹

While the official figure for fuel poverty in Northern Ireland remains at 22%, recent polling commissioned by NEA NI found that 40% of households are spending more than 10% of their income on energy¹⁰, meeting the Department for Communities' definition of fuel poverty¹¹. This concerning statistic, driven by rising energy costs and energy-inefficient homes, underscores the urgency of ensuring that the transition to a low-carbon economy does not exacerbate existing inequalities. Instead, it must create opportunities to improve energy affordability and accessibility for those most in need.

The Commission must explore how Just Transition principles can be applied to effectively address fuel poverty. Additionally, the Commission's advisory role is vital in shaping policies that directly impact fuel poverty and ensure that policies are fair and equitable.

Coordinated Cross-Governmental Approach

NEA NI also stresses the importance of the Commission's role in ensuring a coordinated, cross-departmental approach to decarbonisation. It is essential that the Commission supports the alignment of ongoing efforts across key areas.

For example, within the Department for the Economy, work is underway on the design and rollout of smart electricity meters, the use of biofuels and biomethane to transition away from fossil fuels for heating, and the development of a new low-carbon heating scheme. Similarly, the Department for Communities is focused on developing a new Fuel Poverty Strategy and a replacement fuel poverty and energy efficiency scheme. Additionally, the Department for Health plays a vital role in implementing NICE guidelines on excess winter deaths and illnesses, as well as addressing the health risks associated with cold homes.

⁹ Department for Communities, (2024). '[Consultation on a draft Fuel Poverty Strategy](#)', pg. 11.

¹⁰ National Energy Action, (2024). '[LucidTalk — NEA NI: September 2024 – Northern Ireland \(NI\) Attitudinal Poll](#)'.

¹¹ "A household is said to be in fuel poverty if it needs to spend more than 10 per cent of its income on energy costs." – Department for Communities, (2024). '[Fuel Poverty](#)'.



A key priority for the Commission should be to ensure these initiatives are aligned, maximising their impact and avoiding unnecessary duplication.