



Domestic Water Tariff Principles and Proposals Submission

May 2015

Introduction

The Alzheimer Society of Ireland welcomes the opportunity to comment to the CER on the domestic *tariff structure proposals that have been submitted by Irish Water to the CER, which will inform the water charges plan* scheduled for consultation in June.

About The Alzheimer Society of Ireland

The Alzheimer Society of Ireland is the leading dementia specific service provider in Ireland. The Alzheimer Society of Ireland works across the country in the heart of local communities providing dementia specific services and supports and advocating for the rights and needs of all people living with dementia and their carers.

Our vision is an Ireland where no one goes through dementia alone and where policies and services respond appropriately to the person with dementia and their carers, at the times they need support. A national non-profit organisation, The Alzheimer Society of Ireland is person centred, rights-based and grassroots led with the voice of the person with dementia and their carer at its core.

The Alzheimer Society of Ireland also operates the Alzheimer National Helpline offering information and support to anyone affected by dementia at 1800 341 341.

People with dementia and their carers living at home in the community

There are currently over 48,000 people with dementia in Ireland and 50,000 carers looking after someone with one of the six specified symptoms of dementia. In Ireland, over 90 per cent of carers of people with dementia experience feelings of confinement due to caring. More than two thirds of carers report financial strain. There is a high personal cost to caring and the overall mean score on the General Health Questionnaire (GHQ) for carers of people with dementia is significantly above the accepted cut-off point for mental well-being among carers (O'Shea, 2003).



Many of those caring for people with dementia are older people. Research conducted by the Alzheimer Society of Ireland suggests that 84% of those in a caring role are over 45 and that 37% are over 65 (The Alzheimer Society of Ireland, 2007).

The complex nature of the condition, the type of caring role required and the fact that the majority of carers are themselves older people gives rise to a very wide range of needs among carers and people with dementia living at home. Not least of which is the fact that they spend considerable amounts of time in the home, therefore using more water by virtue of being at home more and needing water for medical and care reasons (extra bathing etc.).

Irish Water's proposed principles and objectives for domestic charging

Water is recognised by the UN as an essential human right as and is also necessary for life and dignity (Special Rapporteur on the human right to safe drinking water and sanitation, Office of the High Commissioner for Human Rights).

The ASI is concerned that the principles and objectives proposed by Irish Water do not include reference to a principle of human rights, solidarity, equality or the need to ensure social protection for vulnerable social groups. The principle referring to fairness and non discrimination must include some reference to the need for positive discrimination in the case of affordability, medical issues etc. In this way, any allowances given to specific groups will be grounded in principles rather than subject to a discretionary practice.

If the CER is committed to ensuring that certain vulnerable groups are protected against affordability issues, then a principle must be included to ensure that this approach is underpinned by a philosophy of solidarity (or equality or social protection or human rights) to more vulnerable groups. Such a principle would balance the principle that sets out fairness and non discrimination, which could in fact undermine any allowances to vulnerable groups.

Social Protection measures and a principle of solidarity

Fuel poverty results in people not heating their homes to a safe or healthy standard. Water poverty could result in people not using adequate levels of water leading to poor hygiene and ill health particularly among those who are financially vulnerable and in need of extra water

Lessons learned in relation to fuel poverty show that when people cannot meet the costs of fuel they do not heat their homes to safe or healthy standard. The equivalent for water will be a reduction in essential water use leading to poor hygiene and ill health, particularly amongst those who are financially vulnerable.



The CER must ensure that water affordability strategies are in place to support vulnerable households, including those with a medical condition, through the allocation of free water allowances, medical allowances, budgeting tools and pre termination polices and exemptions. ASI recommend that persons with a medical condition and the elderly be exempted from disconnection.

The submission as prepared by the Irish Water states that:

Irish Water also notes that the Government has committed to ensuring that measures are in place in advance of the introduction of water charges to address affordability issues. Once a decision has been taken on how these policies will be implemented, Irish Water will work closely with the Government and the CER to implement any such policies. As part of its validation campaign (see Section 4.5), Irish Water will confirm customer data including household type and occupancy details and this will assist in verifying relevant household characteristics when applying any free allowance and/or social protection measures.

Our preference would be for any allowance to be granted in terms of free litres equivalent of water services per day with no carry over permitted, and price points set so as to provide for recovery of revenue requirement after the allowance. However, Irish Water will aim to facilitate any decision made by Government and will work to ensure that the assessed tariff options set out in Section 5.3.5.2 can incorporate any decision made in this regard.

In relation to households with a medical condition and affordability issues, the ASI would suggest that such households can be identified through medically assessed social welfare payments or social supports (e.g. Carers Allowance, Disability Allowance, Home Care Packages etc.). However, ASI would also advise that in addition to households who do not qualify for means tested supports, but who also provide high level care at home, to provide medical certification from their GP.

Irish Water has a specific principle on fairness and non discrimination, which must be balanced with a principle of solidarity with more vulnerable social groups to offset the equality issues that such vulnerable groups will face in terms of access to, and usage of, water when water charges are enacted.

Ends.