

Dublin 15 CIL Peer Forum Response to the Commission for Energy Regulation re Water Charges

Introduction:

The Leader Forum is an independent space for people with disabilities to come together to discuss common experiences, challenges, policy issues and quality of services at local, regional and national level across Ireland. Developed by the Center for Independent Living (CIL), in partnership with CILs at county level, it a space for people with disabilities (PWD) to come together to offer one other peer support and to advocate for equality, independent of any one service provider. The Dublin based CIL Peer Forum, has contributed to a number of initiatives and policy changes both locally and nationally that have been of concern to group members.

Water Charges:

The Dublin 15 CIL Peer Forum believe that the implementation of water charges will put PWD, a sector of society already at higher risk of poverty, at yet further risk. In response to Government announcements on the charges, and the publication of the *'Guide to the CER's Water Charges Plan Consultation for Domestic Customers' (31/07/2014)*, the Leader Forum welcome the affordability measures that will be made to persons with disabilities in receipt of the Household Benefits Package with an allowance of €100 toward an annual water bill. It is crucial that if we have a particular condition that requires a high level of water usage, that this charge will be capped. We urge your consideration of the below recommendations as these limits are determined by the Department of the Environment in conjunction with the consultation process through the Department of Health.

Recommendations:

As people with disabilities we ask that the following be taken into consideration by the CER:

1. The medical conditions that qualify for capped water usage need to be defined:

There are numerous conditions and diseases that people with disabilities suffer from that are not officially recognised as 'long term illness' or 'disability'. These may be debilitating and require multiple showers for pain control, increased washing to manage incontinence, symptom control, infection control or increased frequency of toilet usage. As this usage will contribute to high water usage these conditions need to be recognised to qualify for high water usage and capped charges.

We recommend that people with disabilities who genuinely need to use more water due to a medical condition should not be penalised.

2. If a person with a disability has the ability to work and is contributing to our economy they should not be penalised because they do not qualify for the household benefits package.

We recommend that people with disabilities who are in a position to work should not be penalised with higher water charges.

3. A set water charge should be implemented for all people with disabilities.

We recognise that all people with disabilities want to contribute to the cost of providing clean safe water. We recommend equity in the treatment of all people with disabilities regardless of their medical condition.

4. That Support Services accessed by people with disabilities should not be prohibitive in terms of increasing payment for water usage. Examples of this include water usage for infection control and Health & Safety measures for staff providing support in the home and water usage to ensure cleanliness of spending areas for guide dogs.

We recommend that people with disabilities should not be penalised for water usage based on the delivery of services in the home to support an individual to live Independently.

Conclusion:

The cost of disability is already significantly impacting many people with disabilities, effectively making us prisoners in our own homes. We ask that in approving the tariffs and how those tariffs are applied by Irish Water that you do not impose any further charges or costs upon us that will further isolate us from our family, friends and community. *We ask that there is equity in the distribution of allowances and the charge is capped at a reasonable set rate for all people with disabilities into the future.*

Contact:

For further information please contact Naoise Cunningham at [REDACTED] or naoiscunningham@dublincil.org