



**Irish Heart
Foundation**



2023

Pre-Budget Submission

Every Budget sets a national strategic direction. In Budget 2023, the Government should recognise that in the future the Irish economy will depend more than ever on **building a society with strong population health.**

The economic, health and wider social impacts of COVID-19 have been strongly felt, as have their fiscal impacts on the health service. Coupled with a cost-of-living crisis, building back a healthier society, economy and population needs Government policy to recognise that the way in which we manage the population's health is a major driver of our economic wellbeing.

The social and economic determinants of health are powerful, and they are exacerbated by the current crises. Investing in chronic illness prevention and control, through affordable, cost-effective, high-impact policies and legislative measures will deliver the greatest possible health impact in reducing illness, disability, and premature death.



Budget 2023 presents an opportunity to tackle the aftermath effects of COVID-19 on cardiovascular health: in the short-term by fixing deficits in vital hospital and other health and care services; and through longer term solutions that will reduce chronic disease, build resilience in the population to create a healthier Ireland and minimise the impact of this and future pandemics on public health and the economy. Similarly, it is an opportunity to address the health inequalities that impede thousands of families in Ireland from living full and healthy lives.



A large range of measures is needed to protect and enhance the cardiovascular health of the nation, in addition to more than half a million people in Ireland who are living with heart conditions and the effects of stroke. In this pre-Budget submission, we address fiscal measures that can complement a broader focus on improving cardiovascular health in Ireland.

To address these major challenges, we urge that Budget 2023:



Protects children's health (Priority 1)



Enhances heart and stroke services and supports both in hospitals and the community (Priority 2)



Ensures the VAT system supports communities (Priority 3)



Addresses crucial areas of chronic disease prevention – tobacco cessation & e-cigarette regulation (Priority 4)



Puts Climate and Health to the fore (Priority 5)



Priority 1:

Protecting Children's Health


 Budget Asks:

- ✓ Increase the school meals programme budget by 20% at a cost of €13.6million to help improve food quality.¹ This should include supporting smaller schools where the price per pupil model isn't working
- ✓ Establish a Children's Future Fund to reinvest the proceeds of sugar sweetened drinks tax and other levies on unhealthy foods into a major national programme to improve children's health.
- ✓ Extend the Sugar Sweetened Drink Tax to make it even more effective by
 - Extending the tax to include milk-based drinks
 - Lowering the Band 1 threshold of the levy. Many soft drinks are currently sitting just under the lower threshold 5g per 100ml. This is a great first step – but given that they were able to reformulate very quickly, we think they can go even further.
 - Raising the rate at the Band 2 threshold. The current SSDT rates charged are €16.23 per hectolitre on supplies in Band 1 and €24.39 per hectolitre on supplies in Band 2. In 2021, the yield for Band 2 was €28.5m and in 2020 it was €27.8m.² By far, Band 2 drinks dominate the revenue from SSD tax and indicates that there is still a large volume of sugar in drinks.
- ✓ Introduce a timetable for new taxes incentivising reformulation of unhealthy products, beginning with a new tax on high sugar food products.
- ✓ Carry out more extensive scoping work on other taxes to incentivise reformulation of high fat, sugar and salt products, such as on salty snacks and fast food.
- ✓ Abolish the parental levy for the School Milk Scheme. The parental contribution for the school year 2020 / 2021 amounted to €87,000³ and in 2019/2020 costs, this was €252,349.
- ✓ Create a structure or committee at national level (cross-governmental) to oversee food-related income support programmes for vulnerable population groups.⁴ This group should use the year between Budget 2023 and Budget 2024 to develop these programmes, with a view to rollout in 2024
- ✓ Develop healthy food subsidies targeting disadvantaged communities⁵
- ✓ Provide funding for the implementation of Breastfeeding in a Healthy Ireland: Health Service Breastfeeding Action Plan 2016-2021, which is extended to 2023
- ✓ Provide funding for the development of a new Breastfeeding Action Plan

¹ Parliamentary Question 25959/22 to the Minister for Employment Affairs and Social Protection

² Parliamentary Question 19367/22 to the Minister for Finance

³ Parliamentary Question 19368/22 to the Minister for Agriculture, Food and the Marine

⁴ Recommendation 2 taken from Harrington JM, Leydon CL, Twohig CH, and Vandevijvere S, for the Food-EPI project team. (2020). Policies for Tackling Obesity and Creating Healthier Food Environments in Ireland: Food-EPI 2020. Current policies and priority actions. Cork, School of Public Health, University College Cork 2020

⁵ Recommendation 3 taken from Harrington JM, Leydon CL, Twohig CH, and Vandevijvere S, for the Food-EPI project team. (2020). Policies for Tackling Obesity and Creating Healthier Food Environments in Ireland: Food-EPI 2020. Current policies and priority actions. Cork, School of Public Health, University College Cork 2020

Priority 2:

Enhance heart and stroke services and supports


 Budget Asks:

- ✓ Provide funding of €1million to set up a Cardiovascular Health Unit in the Department of Health & begin developing a new Cardiovascular Health Policy
- ✓ Provide funding for a 5 year Hypertension Awareness and Behaviour Change Campaign led by the Irish Heart Foundation supported by a number of key health and non-government organisations – €3,034,164 over 5 years
- ✓ Provide funding of €10,338,653.70 over 3 years to reach optimal staffing levels for stroke services. This figure should be kept under review to ensure it is suitable to meet stroke incidence projections
- ✓ Provide funding of €4,903,982 over 3 years for the expansion of ESD teams, with €2,257,470 to be made available in 2023 to consolidate the existing 6 teams and expand to 4 additional sites
- ✓ Establish how many stroke survivors are living in Ireland; and invest in research to develop a coherent post discharge pathway that meets the long-term needs of stroke survivors
- ✓ Provide sustainable funding for national physiotherapy services totaling €880,000 per annum across all 9 CHOs
- ✓ Adequately resource existing CR services to meet the standards set down in the previous cardiovascular strategies
- ✓ Expand CR services to be widely accessible and inclusive whilst maintaining the governance structure, quality and integrity of the various CR programme components regardless of location.
- ✓ Provide funding to ensure adequate national capacity for cardiac rehabilitation for patients for whom cardiac rehabilitation is recommended, ensuring staffing and resources are protected
- ✓ Ensure access to dedicated psychological care to improve quality of CR in Ireland
- ✓ Provide funding to ensure regulated and structured Phase IV (maintenance CR) programmes are put in place as part of integrated chronic disease management

Priority 3:

Ensure the VAT system supports communities



Budget Asks:

- ✓ Remove the VAT on AEDs – ensuring it is brought to the 0% rate
- ✓ Retain the VAT Compensation Scheme and increase to €20m annually to reflect a 50% rebate on the overall claims from the sector

Priority 4:

Prevention and Future Proofing



Budget Asks:

- ✓ Increase tobacco taxation annually on a pro-rata basis so that all packs of 20 cigarettes cost at least €20 by 2025. This would require an increase of €1.57 on a pack in Budget 2023
- ✓ Introduce an equivalent annual tobacco tax increase on RYO and the adoption of a taxation policy that acknowledges the substitution impact and adjusts tax rates accordingly to remove incentives to switch to a cheaper alternative
- ✓ Increase the level of funding for tobacco cessation services from the current €13 million to €50 million annually
- ✓ Increase resources, including additional staffing and equipment, to support Revenue's National Action Plan in combatting cigarette smuggling
- ✓ Introduce an annual €500 tobacco retailer license fee per retail outlet, which could raise up to €6,236,500 every year
- ✓ Apply an excise tax of €0.10 per ml/mg of e-cigarette liquid to deter young people and non-smokers from using e-cigarettes
- ✓ Introduce an annual €50 nicotine-inhaling products (e-cigarettes) retailer license fee per retail outlet

Priority 5:

Improving Environmental Health



Budget Asks:

- ✓ Allocate significant funding to local authorities to monitor and enforce air quality legislation and double the maximum fine amount for breaches of regulation from €5,000 to €10,000
- ✓ Introduce a Green Transition Fuel Allowance to facilitate the move away from burning the worst health-affecting solid fuels such as smoky coal, wet wood, and sod turf
- ✓ Extend the Fuel Allowance to recipients of the Working Family Payment, at a cost of €68million
- ✓ Double the current NOX level rate and apply to both category A and B vehicles to yield an estimated extra €120m
- ✓ Implement a daily congestion charge on all private motorised vehicles entering Dublin city centre and examine the feasibility of extending similar congestion charges to other major urban areas
- ✓ Expand the Cycle to Work scheme beyond PAYE
- ✓ Increase the level of funding allocated to the Safe Routes to School programme for 2023 to accelerate implementation and that more schools can avail of it and create additional roles across An Taisce and the NTA to support this initiative
- ✓ Allocate annual funding to the NTA to guarantee the 20% reduction on all PSO general fares, and the 50% YAC discount is made permanent
- ✓ Explore the feasibility of funding further fare reductions to boost public transport passenger numbers
- ✓ Introduce a system of taxation that levies the weight of vehicles, under a user-pays principle



Priority 1

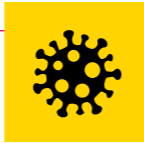
Protect Children's Health

⚠ THREAT

Cost of Living Crisis

In Ireland, like in other countries, the cost of living has risen sharply over the past year. Energy prices have rocketed, and food has been getting more and more expensive. These soaring costs mean that it is harder for parents and guardians to provide regular, healthy meals to their children.

The pandemic had already taken a toll on children's health:



Irish research shows that during the pandemic, children in the lowest income groups were more likely to say they had less participation than usual in organised cultural activities or sports and exercise, and that they were spending less time outdoors⁶.



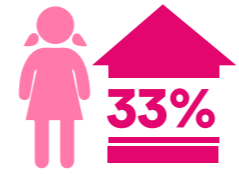
50% of adolescents reported engaging in less physical activity following the introduction of Covid-19 restrictions and COVID-19 had the most impact on physical activity among the least physically active and adolescents living with overweight, obesity or poor prior physical activity habits⁷.



Growing Up in Ireland research shows that consumption of junk food and sweets increased among



12-year-old boys

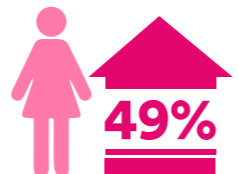


12-year-old girls

The rate among young adults was even higher with increases among



22-year-old men



22-year-old women⁸

51.9%



In the CSO's Social Impact of COVID-19 Survey⁹, 51.9% of households with children reported an increase in consumption of junk food and sweets.



47%



Over 47% of adults in households with children also reported weight gain during the pandemic.



6 Murray, A., McClintock, R., McNamara, E., O'Mahony, D., Smyth, E. and Watson, D. (2021). Growing Up in Ireland: Key findings from the special COVID-19 survey of Cohorts '98 and '08. ESRI Report. [Online] Available from: <https://www.esri.ie/publications/growing-up-in-ireland-key-findings-from-the-special-covid-19-survey-of-cohorts-98-and>

7 Ng K, Cooper J, McHale F, et al. (2020). Barriers and facilitators to changes in adolescent physical activity during COVID-19. *BMJ Open Sport & Exercise Medicine* 2020;6:e000919. doi: 10.1136/bmjsem-2020-000919

8 Murray, A., McClintock, R., McNamara, E., O'Mahony, D., Smyth, E. and Watson, D. (2021). Growing Up in Ireland: Key findings from the special COVID-19 survey of Cohorts '98 and '08. ESRI Report. [Online] Available from: <https://www.esri.ie/publications/growing-up-in-ireland-key-findings-from-the-special-covid-19-survey-of-cohorts-98-and>

9 CSO. (2020). Social Impact of COVID-19 Survey April 2020. April 2020. [Online]. Available from: <https://www.cso.ie/en/releasesandpublications/ep/p-sic19/socialimpactofcovid-19surveyapril2020/>

⚠ THREAT

Food Poverty

The current forecasts for inflation predict an average increase of 6.5% - 7.1% over the course of 2022, and within that is a 5.7% increase in food prices.¹⁰ Recent research shows an increase in the Minimum Essential Standard of Living (MESL) food costs of 2.4%, as of March 2022. This rate of food inflation is exceptional, having been flat or negative for most of the last decade, and below 1% since 2013.¹¹

Obesity is just one of many potentially long-term problems associated with food insecurity and

it is partly because people move toward cheap, energy-dense food in times of crisis. Being able to afford food is affected by other financial demands on households, and food is often the first expenditure to be cut when disposable income is tight.

Unfortunately, child food poverty remains a serious issue in need of sustained action and investment, particularly in light of the cost-of-living crisis.



10 Central Bank of Ireland (2022). Quarterly Bulletin 02 / April 2022. <https://www.centralbank.ie/publication/quarterly-bulletins/quarterly-bulletin-q2-2022>

11 As measured by CPI sub-index 'Food and non-alcoholic beverages', see: <https://data.cso.ie/table/CPM16> The Vincentian Partnership for Social Justice (2022). Submission to Dept. of Social Protection MESL PRE-BUDGET 2023. [Online] Available from: https://www.budgeting.ie/download/pdf/vpsj_mesl_pre-budget_2023_submission.pdf

ACTION

School Meals

Ireland’s school meals and hot school meals programmes are delivered through the Department of Social Protection. Priority for funding is given to schools which are part of the Department of Education’s initiative for disadvantaged schools, ‘Delivering Equality of Opportunity in Schools’ (DEIS). Unfortunately, however, this scheme does not capture all children in need and swathes of children miss out as a result.

The current system of eligibility for free school meals, relying heavily on the DEIS model, could be leading to vulnerable children missing out on the benefits of a free school meal. Recent research published by Safefood¹² has called for consideration to be given to implementing universal free school meals for all school-aged children as a means of addressing health inequalities. This would have a significant effect in addressing the issue of food poverty and would improve the health and wellbeing of all children.

The Safefood research also showed a real and pressing need to address current school meal provision, highlighting doubts among parents about food quality in schools where lunches were provided. If we are to address Pillar 3 of the EU Child Guarantee (Providing free access to a healthy meal each school day and effective access to nutrition), operational problems in relation to how the scheme works must be addressed:

- The funding provided does not provide for catering staff which must be funded by the schools themselves. This causes schools to sell junk food to pay for the hot meals, which is counterintuitive.
- It does not provide sufficient funding to allow a nutritious and fresh meal; many schools cannot avail of the hot meals and purchase processed sandwiches/ meal bags with low nutritional value.

- Breakfast is often missed by a significant number of children and young people, resulting in
 - a) low attention span and poor concentration
 - b) hunger
 - c) older children often fill up on junk food at 11am.
- Breakfast clubs, while hugely important to address this, are however often run by teachers and out of school budgets. This is an issue across all schools. There is a real need for a consistent approach – there is not equal access across Ireland.
- Young people report that the food served through the lunch bags delivered to the schools is often pre-made en masse, they do not enjoy it and there are no menu variations.
- DEIS schools have smaller numbers and find it challenging for economies of scale compared to larger schools, i.e. the price per pupil model simply isn’t working for smaller schools.

BUDGET 2023 ASK

- ✓ Increase the school meals programme budget by 20% at a cost of €13.6million to help improve food quality.¹³ This should include supporting smaller schools where the price per pupil model isn’t working.



¹² Safefood. (2022). Exploring the world of food: The perspective of families with children. April 2022. [Online] Available from: https://www.safefood.net/Professional/Research/Research-Reports/world_of_food

¹³ Parliamentary Question 25959/22 to the Minister for Employment Affairs and Social Protection

ACTION

Children’s Future Fund

Preventative health spending is sound long-term financial management. It means reduced disease – and with that reduced health system cost pressure on Government, especially with respect to long-term chronic disease – in future years and decades. One obvious way to advance this policy direction is to use a ‘future fund’ approach.

Good nutrition is central to the health, wellbeing, and development of children and young people. Without it, children’s health outcomes worsen. Ringfenced funding must be made available to develop new programmes, projects and initiatives that can support children’s health.

BUDGET 2023 ASK

- ✓ Establish a Children’s Future Fund to reinvest the proceeds of sugar sweetened drinks tax and other levies on unhealthy foods into a major national programme to improve children’s health.



¹⁴ Parliamentary Question 19367/22 to the Minister for Finance

ACTION

Extend the Sugar Sweetened Drinks Tax

The success of the sugar sweetened drinks tax is highlighted by research showing a 28.8% fall in the average sugar content of drinks subject to the sugar sweetened drinks tax in the UK and a 21.6% decrease in the total sugar purchased from these drinks. This was achieved with no reduction in overall sales – just a shift to lower or no sugar soft drinks. The Irish evaluation of the SSD tax has yet to be completed or published, but the results are likely to be broadly in line with the UK outcome.

Given its proven effectiveness in reducing sugar intake – and therefore the consumption of useless empty calories – it can be assumed that the sugar sweetened drinks tax will reduce weight across the population over time. When this is added to the fact that sales volumes were unaffected, the potential for the extension of taxation to incentivise reformulation in other unhealthy products becomes clear and attractive.

BUDGET 2023 ASK

- ✓ Extend the Sugar Sweetened Drink Tax to make it even more effective by
 - Extending the tax to include milk-based drinks
 - Lowering the Band 1 threshold of the levy. Many soft drinks are currently sitting just under the lower threshold 5g per 100ml. This is a great first step – but given that they were able to reformulate very quickly, we think they can go even further.
 - Raising the rate at the Band 2 threshold. The current SSDT rates charged are €16.23 per hectolitre on supplies in Band 1 and €24.39 per hectolitre on supplies in Band 2. In 2021, the yield for Band 2 was €28.5m and in 2020 it was €27.8m.¹⁴ By far, Band 2 drinks dominate the revenue from SSD tax and indicates that there is still a large volume of sugar in drinks.

ACTION

Introduce a new Sugar Tax

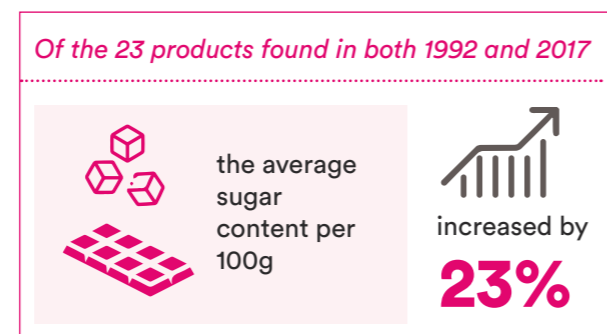
“The evidence suggests, therefore, that we need a measure that places the onus on businesses and not on individuals; that is mandatory and not voluntary; and that covers a wide range of products. This led us to a tax similar to the SDIL, but covering a wider range of products.”



The Henry Dimbleby authored UK National Food Strategy¹⁵ recommends that the UK Government should introduce a £3/kg tax on sugar and a £6/kg tax on salt sold for use in processed foods or in restaurants and catering businesses. The tax would apply to all sugar and other ingredients used for sweetening (such as syrups and fruit extracts, but not raw fruit) at a rate of £3/kg. This is approximately the same rate as the current UK Soft Drinks Industry Levy (SDIL), which the sugar tax would replace. It would apply at a rate of £6/kg to all salt sold for use in food manufacturing. It is recommended that imports of processed food should also be taxed according to sugar and salt content when they enter the UK. Importers should be required to register for the tax, report the amount of added sugar or salt contained in their product, and pay the tax on that sugar or salt at the same rate as charged domestically. The Strategy notes that this tax would have two main effects: incentivising businesses to reformulate their products and driving up the cost of those products which are not reformulated. In terms of price rises, these would be driven mostly by the tax on sugar, which would lead to price increases of 15–25% in desserts, biscuits, confectionery and juice.

Drawing on this recommendation, and the accompanying work by the UK Institute for Fiscal Studies, work should begin immediately on a similar proposal here. This would also be in line with Actions 1.8 and 1.10 of A Healthy Weight for Ireland, Obesity Policy and Action Plan 2016-2025 (Develop proposals on the rollout of evidence-based fiscal measures to support healthy eating and lifestyles; Review the evidence, including the effectiveness of implementation, for fiscal measures on products that are high in fat, sugar and salt to reduce their consumption.)

The ready availability of calorie dense, ultra-processed foods has played a central role in rising child obesity. Research in the UK¹⁶ showed that the level of sugar in chocolate confectionery has increased since 1992.



15 Dimbleby, H. (2021). The National Food Strategy: The Plan. Independent Review
 16 Hashem KM, He FJ, Alderton SA, MacGregor GA. Cross-Sectional Survey of the Amount of Sugar and Energy in Chocolate Confectionery on Sold in the UK in 1992 and 2017. *Nutrients*. 2019 Aug 3;11(8):1798. doi: 10.3390/nu11081798. PMID: 31382636; PMCID: PMC6723546

COVID-19 has prompted an increase in demand for calorie dense food products, which will further fuel the obesity crisis among children.



Increasing the price of confectionery and sweets could be even more effective at cutting obesity levels than increasing the price of sugar sweetened drinks,¹⁸ with UK research showing that a 20% price increase in high sugar snacks has the potential to reduce overall energy purchased among all body mass index (BMI) and household income groups.

Evidence from Mexico shows how effective this could be.



17 Crowe, M., O’Sullivan, M., Casseti, O. et al. Estimation and consumption pattern of free sugar intake in 3-year-old Irish preschool children. *Eur J Nutr* 59, 2065–2074 (2020). <https://doi.org/10.1007/s00394-019-02056-8>
 18 Scheelbeek P F D, Cornelsen L, Marteau T M, Jebb S A, Smith R D. Potential impact on prevalence of obesity in the UK of a 20% price increase in high sugar snacks: modelling study *BMJ* 2019; 366 :l4786 doi:10.1136/bmj.l4786
 19 First-Year Evaluation of Mexico’s Tax on Nonessential Energy-Dense Foods: An Observational Study <https://doi.org/10.1371/journal.pmed.1002057>



BUDGET 2023 ASK

- ✓ Introduce a timetable for new taxes incentivising reformulation of unhealthy products, beginning with a new tax on high sugar food products.
- ✓ Carry out more extensive scoping work on other taxes to incentivise reformulation of high fat, sugar and salt products, such as on salty snacks and fast food.

ACTION

End Disadvantage in Food Provision

Although the cost-of-living crisis has become more prevalent in public, political and policy discourse in recent times, it is anything but new. Struggling to make ends meet, food poverty and health inequality has been a reality for many households long before this. Inequality has a compounding effect, perpetuating and worsening conditions for those least well off. Socio-economic disadvantage results in persistent inability to take healthy actions, resulting in poorer health outcomes and inability to access services to deal with illness. This perpetuates a vicious cycle of ill health and poverty. Safefood research details how parents who were wholly dependent on social welfare or other benefits for their income described the importance and value of social welfare policies in helping to plug gaps in their food budgets and tide them over with staple supplies for the month.²⁰

A range of social, economic, and environmental factors mean that unhealthy behaviours often cluster in lower socio-economic groups, fuelling significant health inequalities. There are stark differences in health outcomes between people from different socio-economic groups – for example, a significant disparity in childhood obesity is apparent between disadvantaged and other schools and this disparity is widening, particularly in older primary school children (COSI 2020).

Cost can be a key factor inhibiting families on low incomes and children in need from having effective access to nutrition. Fiscal measures as well as targeted interventions are needed to ensure families have access to foods that promote rather than undermine health. Taxes are not meant to be a solution in isolation, but part of a larger portfolio of policy measures; restrictions on advertising of unhealthy products, healthy food policies in public spaces and other interventions must be implemented (e.g., healthy

food subsidies) to mitigate perceived unintended effects. While taxation can raise prices to discourage unhealthy behaviours or encourage reformulation, subsidies can also be used to reduce prices or offer incentives for healthy behaviours. Government can offer direct subsidies or indirect subsidies to achieve their aims.

For promoting and ensuring healthier diets in this time of crisis, one complementary approach to taxing sugary drinks—subsidising healthy foods—must be adopted. Although Ireland does have some school fruit and vegetable schemes in place²¹, the provision of subsidies is underutilised, despite having great potential to reach vulnerable segments of the population. Subsidies are effective in improving the nutritional quality of diets and combining subsidies and taxes has the greatest potential to do this. Therefore, the Irish Heart Foundation recommends using tax revenues from the SSD tax and sugary snacks levy to fund a healthy food incentive scheme.

BUDGET 2023 ASK

- ✓ Abolish the parental levy for the School Milk Scheme. The parental contribution for the school year 2020 / 2021 amounted to €87,000²² and in 2019/2020 costs, this was €252,349.
- ✓ Create a structure or committee at national level (cross-governmental) to oversee food-related income support programmes for vulnerable population groups.²³ This group should use the year between Budget 2023 and Budget 2024 to develop these programmes, with a view to rollout in 2024
- ✓ Develop healthy food subsidies targeting disadvantaged communities²⁴

²⁰ Safefood. (2022). Exploring the world of food: The perspective of families with children. April 2022. [Online] Available from: https://www.safefood.net/Professional/Research/Research-Reports/world_of_food

²¹ The EU School Scheme Strategy 2017-2023 (incorporating both the School Fruit and Vegetables Scheme and the School Milk Scheme).

²² Parliamentary Question 19368/22 to the Minister for Agriculture, Food and the Marine

²³ Recommendation 2 taken from Harrington JM, Leydon CL, Twohig CH, and Vandevijvere S, for the Food-EPI project team. (2020). Policies for Tackling Obesity and Creating Healthier Food Environments in Ireland: Food-EPI 2020. Current policies and priority actions. Cork, School of Public Health, University College Cork 2020

²⁴ Recommendation 3 taken from Harrington JM, Leydon CL, Twohig CH, and Vandevijvere S, for the Food-EPI project team. (2020). Policies for Tackling Obesity and Creating Healthier Food Environments in Ireland: Food-EPI 2020. Current policies and priority actions. Cork, School of Public Health, University College Cork 2020



ACTION

Increase focus on nutrition in a child's first 1,000 days

The period from conception to a child's second birthday, often referred to as the first 1,000 days, is a critical period for nutritional programming and the development of childhood obesity related risk factors. The first 1,000 days of life offer a unique window of opportunity to contribute to obesity prevention. Strategies employed during this critical period can help reduce obesity risk in later life and promote lifelong health.

One area of significant concern is the level of breastfeeding in Ireland. Ireland has one of the lowest national levels of breastfeeding in the world, despite the majority of mothers initiating breastfeeding in Irish maternity units. Breastfeeding has major short and long-term health benefits, including better protection from acute infections for children. Recent Irish research using the Growing Up in Ireland Child Cohort also showed that breastfeeding for between three and six months reduces the risk of obesity at age nine by 38 per cent.

BUDGET 2023 ASK

- ✓ Provide funding for the implementation of Breastfeeding in a Healthy Ireland: Health Service Breastfeeding Action Plan 2016-2021, which is extended to 2023
- ✓ Provide funding for the development of a new Breastfeeding Action Plan



Priority 2

Enhance heart and stroke services and supports

THREAT

No comprehensive Cardiovascular Health Policy

The Department of Health's *Changing Cardiovascular Health: Cardiovascular Health Policy 2010 - 2019* established a framework for the prevention, detection and treatment of cardiovascular diseases, to reduce the burden of these conditions. No review or progress report was ever conducted on the implementation of its recommendations. Even though there is an ongoing National Review of Specialist Cardiac Services, it deals with optimal configuration of a national adult cardiac service and broader cardiovascular health policy operates in a vacuum with no overarching policy guidance and direction. A new Cardiovascular Policy is needed as a matter of priority.

ACTION

Set up a Cardiovascular Health Unit in the Department of Health

Unlike other NCDs like cancer, there is no designated official or unit with policy responsibility for cardiovascular health within the Department of Health. Given the burden of cardiovascular disease on the Irish healthcare system, this must be urgently addressed. Alongside this, there must be a review of *Changing Cardiovascular Health: Cardiovascular Health Policy 2010 - 2019* and a new Cardiovascular Health Policy must be developed.

BUDGET 2023 ASK

- ✓ Provide funding of €1million to set up a Cardiovascular Health Unit in the Department of Health & begin developing a new Cardiovascular Health Policy

ACTION

Increase Blood Pressure Awareness in the Population

Despite being the leading modifiable risk factor for cardiovascular disease and premature death, research has shown that Ireland has one of the lowest rates of awareness, treatment, and control of hypertension among 12 high-income countries²⁵. The costs of hypertension related disease alone in Ireland are estimated to be around €721,606,082. The World Health Organisation recommends an absolute risk approach for the control of high blood pressure, describing it as the 'best buy' available to governments to support people who have had a heart attack or stroke or are at high risk of a cardiovascular event. Cardiovascular Health Policy 2010 – 2019 and a new Cardiovascular Health Policy must be developed.

BUDGET 2023 ASK

- ✓ Provide funding for a 5 year Hypertension Awareness and Behaviour Change Campaign led by the Irish Heart Foundation supported by a number of key health and non-government organisations – €3,034,164 over 5 years



²⁵ NCD Risk Factor Collaboration. (2019). Long-term and recent trends in hypertension awareness, treatment, and control in 12 high-income countries: an analysis of 123 nationally representative surveys. *The Lancet* VOLUME 394, ISSUE 10199, P639-651, AUGUST 24, 2019. DOI:[https://doi.org/10.1016/S0140-6736\(19\)31145-6](https://doi.org/10.1016/S0140-6736(19)31145-6) [Online] Available from: [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(19\)31145-6/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(19)31145-6/fulltext)

THREAT

No publication date for the National Stroke Strategy

While the Irish Heart Foundation has endorsed all the recommendations in the National Stroke Strategy as drawn up by the National Stroke Programme, the Strategy itself has yet to be published and accordingly, there is no implementation plan.

ACTION

Publish and ensure funding for the National Stroke Strategy

We believe this strategy can provide a roadmap to the development of world class acute services in this country. We call for full funding for the Strategy and that it be published with a comprehensive accompanying implementation plan.

The Stroke Programme has estimated that, based on the potential increase in stroke numbers and the average length of stay for stroke, 327 acute stroke beds are required in Ireland, where there are only 239 currently.²⁶ The National Clinical Programme for Stroke has advised that adequate staffing of stroke units is essential to ensure proper care; enhance acute treatment delivery; prevent and manage complications; start patient recovery and discharge planning early; and to ensure proper patient and carer education and support. There are nursing deficits of 24% within the current number of stroke unit beds. Similarly, there are gaps in Health and Social Care Professional staff numbers for all disciplines. Worryingly, the recently published Irish National Audit of Stroke (INAS) Organisational Audit Report 2021 reported that only five out of the 24 stroke units across the country had access to clinical psychology. Increasing staff WTEs to the required level requires significant investment and lead time to recruit suitable qualified personnel. Early Supported Discharge (ESD) for stroke is an international model of best care for stroke patients



that improves patient outcomes while facilitating a faster discharge home from hospital through the provision of stroke-specific rehabilitation in the home setting. The National Stroke Strategy has a planned 3-year phased implementation plan for the expansion of ESD teams. The strategy aims to have 21 ESD teams in place to cover 92% of stroke services. Funding for this expansion must be made available immediately.

BUDGET 2023 ASK

- ✓ Provide funding of €10,338,653.70 over 3 years to reach optimal staffing levels for stroke services. This figure should be kept under review to ensure it is suitable to meet stroke incidence projections
- ✓ Provide funding of €4,903,982 over 3 years for the expansion of ESD teams, with €2,257,470 to be made available in 2023 to consolidate the existing 6 teams and expand to 4 additional site

26 Parliamentary Question 27462/22 to the Minister for Health

ACTION

Begin addressing post-discharge service and support needs

Huge improvements in acute stroke care during the last decade has not been matched by any corresponding upgrading of post discharge rehabilitation and support. Early Supported Discharge replaces in-hospital services and is therefore separate from the ongoing help people need to address the physical, communication and psychological impacts of stroke.

Widespread lack of access to post discharge services has resulted in a strong sense of abandonment among stroke survivors. This requires an extension of the formal stroke pathway beyond the hospital gates and into community-based measures promoting recovery and wellbeing.

The lack of focus on what happens to stroke survivors post discharge is such that the health services have never tried to establish how many stroke survivors are living in Ireland, let alone try and meet their needs. The official estimate of 30,000 comes from a report published almost a quarter of a century ago that based the figure on international estimates.

It is unsurprising, therefore, ESRI's 2013 Cost of Stroke in Ireland study for the Irish Heart Foundation found that out of a direct cost of stroke to the economy of up to €557 million, as much as €414 million was spent on nursing home care for a relatively small number of stroke survivors and less than €7 million of services and supports that enable people to remain living at home. The clear conclusion was that major human and economic benefits could be derived by investment in services that pre-empt long-term institutional care.

BUDGET 2023 ASK

- ✓ Establish how many stroke survivors are living in Ireland; and invest in research to develop a coherent post discharge pathway that meets the long-term needs of stroke survivors

27 Multiple Sclerosis Society of Ireland Pre-Budget Submission 2023

ACTION

Sustainable funding for national physiotherapy services²⁷

The Irish Heart Foundation supports the calls from the Multiple Sclerosis Society of Ireland in their Pre-Budget Submission 2023 for national physiotherapy services for people with Multiple Sclerosis, and other neurological conditions, including stroke. The proposal aims to deliver a sustainable, national physiotherapy service provided by a team of specialist physiotherapists directly employed by MS Ireland and delivered at a regional level using a blend of 'online' and 'in-person' programmes and services. The funding required is for one Senior Physiotherapist employed by MS Ireland, plus running costs in each HSE CHO area, together with a national manager and administrator. The cost across all nine CHOs is €880,000 per annum. There is flexibility to either fund nationwide, or to scale up on a phased basis over a few years.

BUDGET 2023 ASK

- ✓ Sustainable funding for national physiotherapy services totaling €880,000 per annum across all 9 CHOs



THREAT

Inadequate access to cardiac rehabilitation

Cardiac rehabilitation (CR) is a continuous process of care which begins in hospital and is an internationally recognised standard of care for patients recovering from a cardiac event. CR is considered an essential component of secondary prevention for patients with cardiovascular disease (CVD) due to the rigorous and extensive evidence base supporting its clinical effectiveness and is a class 1A recommendation for patients with coronary heart disease and heart failure. The National Clinical Programme for Acute Coronary Syndrome sets a KPI of 90% of patients with a STEMI receiving referral for timely cardiac rehabilitation. However, the recent Irish Heart Attack Audit found that only 71% of patients were referred to cardiac rehabilitation over the reporting period.²⁸

The HIQA Health technology assessment of chronic disease self-management support interventions and the HSE’s National Self-Management Support Framework identified cardiac rehabilitation as one of the most cost-effective methods of supporting patients to self-manage and improve clinical and health service usage outcomes (resulting in a 30% reduction in hospitalisation in 1 year and a 58% relative risk reduction in mortality in one year).

Despite this, research by the Irish Heart Foundation and Irish Association of Cardiac Rehabilitation revealed that although the number of patients increased by 20% over the last decade, staffing levels have fallen by 40%. Furthermore, a small number of CR centres are currently unable to offer a full service due to the loss of dedicated facilities and clinical staff.

There must be equitable access to this essential service across all regions of the country. Although funding is being provided to develop services under the HSE’s chronic disease management programme, this is insufficient and is focused on the major population centres, away from the

CR centres most impacted by deficits. Returning just one WTE staff member per centre could potentially increase access to high quality CR from 5063 to 7189 cardiac patients annually.

ACTION

Ensure patients after suffering an acute cardiac event are offered and have access to an appropriate cardiac rehabilitation programme

BUDGET 2023 ASK

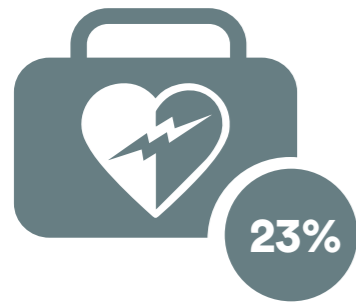
- ✓ Adequately resource existing CR services to meet the standards set down in the previous cardiovascular strategies
- ✓ Expand CR services to be widely accessible and inclusive whilst maintaining the governance structure, quality and integrity of the various CR programme components regardless of location.
- ✓ Provide funding to ensure adequate national capacity for cardiac rehabilitation for patients for whom cardiac rehabilitation is recommended, ensuring staffing and resources are protected
- ✓ Ensure access to dedicated psychological care to improve quality of CR in Ireland
- ✓ Provide funding to ensure regulated and structured Phase IV (maintenance CR) programmes are put in place as part of integrated chronic disease management



Priority 3

Ensure the VAT system supports communities

²⁸ National Office of Clinical Audit (2022) Irish Heart Attack Audit National Report 2017–2020. Dublin: National Office of Clinical Audit. [Online] Available from: <https://www.noca.ie/documents/irish-heart-attack-national-report-2017-2020>



⚠ THREAT

Under Irish VAT legislation automated external defibrillators (AEDs) are currently liable to VAT at the standard rate (23%)

A single defibrillator typically costs in the region of €1,300 plus VAT at present, whilst maintenance costs are also significant. Removing the VAT element of the cost would greatly increase the ability of sports and other community organisations, for example, to provide vital emergency assistance in the event of cardiac arrests.

📋 ACTION

Scrap the tax on AEDs using new EU legislation

The Irish Heart Foundation has been running a campaign to scrap the tax on AEDs, a move that has been made possible by the publication of the European Union Council Directive EU 2022/542 of 5 April 2022 amending Directives 2006/112/EC and EU 2020/285 as regards rates of value added tax. Provision for such action is covered in the following annex to the Council Directive:

“(4) Medical equipment, appliances, devices, items, aids and protective gear, including health protection masks, normally intended for use in health care or for the use of the disabled, goods essential to compensate and overcome disability, as well as the adaptation, repair, rental and leasing of such goods;”.

🔄 BUDGET 2023 ASK

- ✓ Remove the VAT on AEDs – ensuring it is brought to the 0% rate



⚠ THREAT

Charities under financial pressure post COVID-19

A single defibrillator typically costs in the region of €1,300 plus VAT at present, whilst maintenance costs are also significant. Removing the VAT element of the cost would greatly increase the ability of sports and other community organisations, for example, to provide vital emergency assistance in the event of cardiac arrests.

📋 ACTION

Retain and expand the VAT Compensation Scheme

The Irish Heart Foundation, as a member of The Wheel, supports calls in the sector for the retention and expansion of the VAT Compensation Scheme. The pilot VAT Compensation Scheme, introduced by Minister Donohoe in Budget 2018 on an initial three year basis, provided a partial rebate on VAT costs based on the level of non-public-funding income. The initial fund was capped at €5m and was very substantially oversubscribed. As a result, rebates made on a pro-rata basis resulted in charities receiving only approximately €1 for every €8 claimed. Denmark, with a similar population size and charity structure to Ireland, operates a scheme rebating €20m annually.

🔄 BUDGET 2023 ASK

- ✓ Retain the VAT Compensation Scheme and increase the to €20m annually, to reflect a 50% rebate on the overall claims from the sector



! THREAT

Reduction in adult smoking prevalence has stalled while youth smoking has increased for the first time in decades

According to the latest Healthy Ireland survey, smoking levels among the adult population in Ireland still stand at 18% in 2021²⁹. Of greater alarm however is that after decades of consistent fall in youth smoking levels, from 41% in 1995 to 13.1% in 2015, smoking levels among this cohort rose for the first time in years to 14.4% in 2019³⁰. Evidence shows that the most effective way to reduce smoking levels is through tobacco tax increases³⁰, particularly for young people who are more price sensitive³¹.

📋 ACTION

Increase the level of taxation on all tobacco products

As the current level of smoking stands at 18%, it is wholly unrealistic that we will achieve the Tobacco Free Ireland goal of having a smoking prevalence of 5% or less by 2025. In 2022, the most popular price category (MPPC) for a pack of 20 cigarettes stands at €15.30. To reduce smoking levels and save lives, the Irish Heart Foundation recommends increasing the MPPC of a pack of 20 cigarettes annually on a pro-rata basis so that it will be €20 by 2025.

🎯 BUDGET 2023 ASK

- ✓ Increase tobacco taxation annually on a pro-rata basis so that all packs of 20 cigarettes cost at least €20 by 2025. This would require an increase of €1.57 on a pack in Budget 2023.



Priority 4

Prevention and Future Proofing

²⁹ HSE. (2021). Healthy Ireland Survey 2021. Available here: <https://assets.gov.ie/41141/e5d6fea3a59a4720b081893e11fe299e.pdf>

³⁰ Sunday S, Hanafin J, Clancy L. Increased smoking and e-cigarette use among Irish teenagers: A new threat to Tobacco Free Ireland 2025. ERJ Open Res 2021; in press (<https://doi.org/10.1183/23120541.00438-2021>).

³¹ World Bank. (1999). Curbing the epidemic: governments and the economics of tobacco control. Available here: <http://web.worldbank.org/archive/website00345C/WEB/COVER2.HTM>



THREAT

Rise in youth use of roll-your-own cigarettes

The growing trend of RYO tobacco use was highlighted in the HSE's State of Tobacco Control Report 2022³². While population prevalence of RYO use has remained at 5% since 2013, as overall smoking prevalence has decreased, the proportion of current smokers using RYO products has increased steadily and stood at 31% in 2021.

ACTION

Increase the level of taxation of Roll-Your-Own tobacco products to combat rising use

Between 2013 and 2021, the proportion of smokers using RYO products rose from 21.2% to 30.7%. Reports have shown that price has been a major factor in the shift to RYO, as well as the false perception that they are healthier than manufactured cigarettes with less risk³³. To counter this, it is imperative that an equivalent tax increase is introduced on RYO.

BUDGET 2023 ASK

- ✓ Introduce an equivalent annual tobacco tax increase on RYO and the adoption of a taxation policy that acknowledges the substitution impact and adjusts tax rates accordingly to remove incentives to switch to a cheaper alternative

32 Ding A. Youth are more sensitive to price changes in cigarettes than adults. *Yale J Biol Med.* 2003;76(3):115-124.
 33 HSE Tobacco Free Ireland Programme. (2022). The State of Tobacco Control in Ireland 2022 Second Report. [Online] Available from: <https://www.hse.ie/eng/about/who/tobaccocontrol/news/state-of-tobacco-control-report-2022.pdf>



THREAT

Inadequate support for smokers seeking to quit

18% of the current adult population smoke. This is far more pronounced among those who are unemployed (38%) and who have not completed their leaving certificate (22%). Despite smoking leading to 4,500 premature deaths a year in Ireland and costing the health service over €400 million annually³⁴, a mere €13 million was spent last year to support smokers to quit through tobacco cessation services³⁵.

ACTION

Increase the annual level of funding for tobacco cessation services to €50 million

Research shows that smokers are much more likely to quit with support than without- smokers are up to four times more likely to succeed in quitting with specialist QUIT support than if they try to quit unaided³⁷. In 2021, a majority of smokers reported a positive intention to quit and nearly half of those who were recently or currently smokers reported at least one quit attempt. Unfortunately, support is lacking, and a significant increase in the level of tobacco cessation funding is urgently required.

Smoking leads to
4,000
 premature deaths a year in Ireland

Smoking costs the health services
400 million
 annually

BUDGET 2023 ASK

- ✓ Increase the level of funding for tobacco cessation services from the current €13 million to €50 million annually



34 Evans D, O'Farrell A, Hickey P. Roll Your Own Cigarettes in Ireland – Key Trends and Patterns. Health Service Executive. 2017. <http://hse.ie/eng/about/Who/TobaccoControl/Roll-Your-Own-Report-2017.pdf>
 35 Kearney, James. (2016) An assessment of the economic cost of smoking in Ireland. ICF International. Available here: <https://assets.gov.ie/34808/8b5d52e00a4447419f38b447733d02b9.pdf>
 36 Parliamentary question Ref: PQ 24262/22
 37 HSE. (2016) Smoking cessation and mental health. Available here: <https://www.hse.ie/eng/about/who/tobaccocontrol/smoking-cessation-and-mental-health-briefing-document.pdfv>



THREAT

The illicit tobacco trade

According to the Illegal Tobacco Products Research Surveys 2021³⁸, 13% of the packs held by smokers surveyed were classified as illegal. Of these packs, 89% are classified as contraband, 4% “illicit whites” and 7% are counterfeit. While the 13% figure in 2021 is a 2% drop from 2019 levels, the illicit tobacco trade still looms as a threat to the state as this represents a potential loss of approximately €264 million to the exchequer.

ACTION

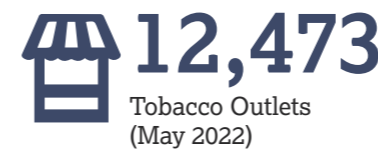
Provide greater support for Revenue to combat the illicit tobacco trade in Ireland

Revenue must be acknowledged for its targeted actions in 2021, which led to a seizure of over 60 million illicit cigarettes with a value of €43.5 million, an increase of 26% in the number of illicit cigarettes seized in 2020. To ensure that Revenue’s success continues and the illicit tobacco trade in Ireland is further pressed, additional resources should be allocated to support Revenue’s work.

BUDGET 2023 ASK

- ✓ Increase resources including additional staffing and equipment to support Revenue’s National Action Plan in combatting cigarette smuggling.

³⁸ Revenue (2022). Illegal Tobacco Products Research Surveys 2021. May 2022. [Online] Available from: <https://www.revenue.ie/en/corporate/documents/research/tobacco-surveys-2021.pdf>



THREAT

The proliferation of tobacco retail outlets

As of May, this year, there were 12,473 retail outlets registered to sell tobacco³⁹, the equivalent of one tobacco outlet per 410 people in the state⁴⁰. There is an abundance of international evidence that shows that greater retail availability of tobacco is associated with greater overall smoking prevalence⁴¹.

Currently, anyone selling tobacco products by retail in Ireland whether over the counter or from a self-service vending machine must register with the National Tobacco Control Office (NTCO)⁴². Each applicant registering with the NTCO must pay a one-off application fee of €50 and this fee only applies once to a business regardless of how many business retail outlets they have⁴³.

ACTION

Increase the current tobacco retailer license fee to an annual figure of €500

Evidence from Australia shows that a substantial increase in the tobacco retailer license fee is associated with a significant reduction in the number of tobacco licenses purchased or renewed by retail outlets.

The Public Health (Tobacco and Nicotine-Inhaling Products) bill 2019 will update the current retail registry system by providing that an applicant must pay an annual license fee for each individual premise. However, it does not indicate what fee will be prescribed. In the Department of Health’s Regularly Impact Analysis of the bill, it notes that “currently there is an annual fee of €500 per category of alcohol product to be sold and it is considered that the fee to sell tobacco products should be equivalent so as to represent the seriousness of the product being sold⁴⁴.”

BUDGET 2023 ASK

- ✓ Introduce an annual €500 tobacco retailer license fee per retail outlet, which could raise up to €6,236,500 every year

³⁹ Parliamentary question 24260/22

⁴⁰ CSO. (2022) Press statement census of population 2022 – preliminary results. Available here: <https://www.cso.ie/en/csolatestnews/pressreleases/2022pressreleases/pressstatementcensusofpopulation2022-preliminaryresults/>

⁴¹ Department of Health and Human Services (2017) Why Retailers Stop Selling Tobacco and Implications for Tobacco Control [PDF], Available at: http://www.smokefreetasmania.com/wp-content/uploads/2014/11/Final-draft_-_why-retailers-stop-selling-tobacco-full-report_DHHSstyle-29052017-1.pdf

⁴² National Register of Tobacco Retailers. About the Register. [Online] Available at: <http://www.tobaccoregister.ie/about-the-register/about-the-register.html>

⁴³ National Tobacco Control Office, HSE 2019, email, 22 May, <info.tobaccoregister@hse.ie>

⁴⁴ Department of Health. Summary of Regulatory Impact Analysis (RIA). Available here: <https://assets.gov.ie/39090/3c78595379bf44c0a3411638c422f08c.pdf>



THREAT

The rise in e-cigarette use among children and adolescents

Research has shown that e-cigarettes and ‘vaping’ are becoming increasingly popular among young people who have never smoked. Among teenagers aged 15-16 years of age, evidence shows that e-cigarette ever-use increased significantly from 23% in 2015 to 37.2% in 2019, while current-use rose from 10.1% to 18.1% across that same period⁴⁵. E-cigarettes are not harm-free⁴⁶, contain considerable levels of nicotine, and can act as a gateway to eventual tobacco use⁴⁷. Although the long-anticipated Public Health (Tobacco and Nicotine-inhaling products) Bill 2019 will help deter youth use by banning the sale of e-cigarettes to those under the age of 18, much stronger action is required.

ACTION

Introduce excise duty on e-cigarettes

It has been well documented by evidence that raising taxes on tobacco products is the most cost-effective measure to reduce smoking⁴⁸, particularly for young people who are more cost-sensitive. According to research, a 10% increase in price for a pack of cigarettes reduces teenage smoking prevalence by 14%⁴⁹. This suggests that taxation on e-cigarettes could also reduce use, particularly among young people.

BUDGET 2023 ASK

- ✓ Apply an excise tax of €0.10 per ml/mg of e-cigarette liquid to deter young people and non-smokers from purchasing and taking up electronic

“The price of vapes is an attraction to vaping”

Katelyn
(youth volunteer with Spunout)

“Young people [are] taking up vaping because you can buy cheap vapes for next to nothing”

Emma
(youth volunteer with Spunout)



45 Sunday S, Hanafin J, Clancy L. Increased smoking and e-cigarette use among Irish teenagers: A new threat to Tobacco Free Ireland 2025. ERJ Open Res 2021; in press (<https://doi.org/10.1183/23120541.00438-2021>).

46 World Health Organisation. (2020) E-cigarettes are harmful to health. Available here: <https://www.who.int/news/item/05-02-2020-e-cigarettes-are-harmful-to-health>

47 Health Research Board. (2020) New HRB evidence shows e-cigarettes are associated with adolescents starting to smoke tobacco cigarettes. Available here: <https://www.hrb.ie/news/press-releases/single-press-release/article/new-health-research-board-evidence-shows-e-cigarettes-are-associated-with-adolescents-starting-to-sm/>

48 Marquez, Patricio V. (2017). Taxation: Most effective but still least-used tobacco control measure. World Bank. Available here: <https://blogs.worldbank.org/health/taxation-most-effective-still-least-used-tobacco-control-measure#:~:text=Raise%3A%20Raising%20taxes%20to%20increase,used%20tobacco%20control%20measures%20globally.>

49 Ding A. (2003) Youth are more sensitive to price changes in cigarettes than adults. Yale J Biol Med. 2003;76(3):115-124.



THREAT

The proliferation of outlets selling electronic cigarettes

At this moment in time, there is no retail licensing system for outlets to register with to sell nicotine-inhaling products. The Public Health (Tobacco and Nicotine-Inhaling Products) bill 2019 will remedy this by introducing a licensing system that retailers seeking to sell nicotine-inhaling products, such as e-cigarettes will have to register with.

ACTION

Introduce an annual fee per outlet registering with the nicotine-inhaling products retail register

The establishment of a retail registration system for outlets seeking to sell nicotine-inhaling products will allow the state to create a data point of where e-cigarettes are being sold nationally. By applying a reasonable annual fee per retail outlet registering to sell nicotine-inhaling products, it will have the dual benefit of reducing the number of locations selling e-cigarettes and raising vital revenue for the exchequer.

BUDGET 2023 ASK

- ✓ Introduce an annual €50 nicotine-inhaling products (e-cigarettes) retailer license fee per retail outlet





Priority 5

Improving Environmental Health



⚠️ THREAT

Lack of enforcement of Air Quality Standards

Low Smoke Zones (LSZs) and the Air Pollution Act Regulations 2012 set standards and legislate the types of fuel permitted to be used for domestic heating. Ensuring that these standards are complied with by the public is vital to ensuring good air quality. Sadly, 1,300 lives are lost every year due to air pollution and the vast majority of these are due to particulate matter from the burning of solid fuels in domestic settings⁵⁰. Local authorities are responsible for the enforcement and policing of these standards; however, they often lack the proper resources to adequately do so.

📋 ACTION

Boost funding for enforcement and increase fines for breaches

The new enhanced solid fuel regulations will provide local authorities with sufficient powers to ensure effective compliance within their functional areas. Although €1.2 million has been allocated to support a regional approach to air quality enforcement⁵¹, it is imperative that substantially more funding dedicated to enforcing air quality standards is provided to local authorities to ensure clean air for the benefit of public health. Furthermore, to reflect the seriousness of the health threat and prevent the burning of illegal solid fuels, a stronger financial deterrent must be put in place⁵³.

🎯 BUDGET 2023 ASK

- ✓ Allocate significant funding to local authorities to monitor and enforce air quality legislation and double the maximum fine amount for breaches of regulation from €5,000 to €10,000



⁵⁰ EPA (2020). Air quality in Ireland 2019. Available here: <https://www.epa.ie/publications/monitoring--assessment/air/Air-Quality-In-Ireland-2019.pdf>

⁵¹ Parliamentary question 24266/22

⁵² Westmeath county council. Air Quality. Available here: <http://www.westmeathcoco.ie/en/ourservices/environment/pollutioninvestigationcontrol/airquality/v>



⚠️ THREAT

Risk of inflating the number of households experiencing energy poverty

The new solid fuel regulations will effectively ban smoky coal and wet wood nationwide while restricting the extraction and burning of sod turf commercially. While this is to be hugely welcomed, it risks increasing the number of households at risk of energy poverty. With the rapid rise in inflation and fuel costs, the ESRI has recently estimated the share of households in energy poverty now stands at 29%⁵³.

📋 ACTION

Protect more vulnerable households from the risk of energy poverty

To ensure that the incoming regulations do not exacerbate fuel poverty and to support these households to heat their homes, a dedicated green transition fuel allowance should be introduced to complement the existing fuel allowance scheme. This new green transition fuel allowance would be established on a similar model to the existing scheme, providing weekly payments to the nearly 350,000 recipients of the Fuel Allowance⁵⁴. It would be strictly regulated by allowing only the purchase of healthier, more sustainable forms of domestic fuels and appliances.

With the price of energy and fuel increasing due to high levels of inflation, more working families and households who do not qualify for the Fuel Allowance will struggle to pay their energy bills. To alleviate the growing burden of working households falling into energy poverty, this budget must extend the Fuel Allowance to recipients of the Working Family Payment (WFP). According to the Society of St. Vincent de Paul⁵⁵, this expansion of eligibility would be €68million.

🎯 BUDGET 2023 ASKS

- ✓ Introduce a Green Transition Fuel Allowance to facilitate the move away from burning the worst health-affecting solid fuels such as smoky coal, wet wood, and sod turf
- ✓ Extend the Fuel Allowance to recipients of the Working Family Payment, at a cost of €68million

⁵³ Barrett Michell, Farrell Niall, et Roantree Barra. (2022) Energy poverty and deprivation in Ireland. ESRI. Available here: <https://www.esri.ie/system/files/publications/RS144.pdf>

⁵⁴ Parliamentary Question 24274/22

⁵⁵ Society of St. Vincent de Paul. (2022). Pre-Budget Submission 2023 "The Cost of Surviving". [online] Available from: <https://www.svp.ie/getattachment/5ca78a6d-af8a-4f3c-a713-09dcb3da5473/SVP-PBS-2023-The-Cost-of-Surviving.aspx>



⚠️ THREAT

Health impact of rising nitrogen dioxide (NO₂) pollution

NO₂ is one of a group of highly reactive gases known as oxide of nitrogen or nitrogen oxides (NO_x). The main source of NO₂ in our towns and cities is road transport with diesel engines producing more of these emissions than petrol vehicles. Due to the harmful impact of NO₂ on health, particularly for children, the government introduced the Nitrogen Oxide levy to reduce the use of higher emitting cars.

📋 ACTION

Protect more vulnerable households from the risk of energy poverty

With traffic levels returning to pre-Covid levels, it is imperative that this budget reduces the source of toxic NO₂ levels, primarily diesel vehicles, and encourages the shift to more sustainable forms of transport. To achieve this, the NO_x levy should be doubled and applied to both category A and B vehicles. This would have the dual benefit of lowering health-harming NO₂ emissions, encouraging more sustainable forms of transport, and raising an estimated €120m for the exchequer⁵⁶.

Moreover, to counter the harmful rise of diesel and, as recommended by the OECD, this government should "gradually increase the diesel tax rate so that it at least reaches the petrol tax rate [and] phase out the price cap for diesel used by road hauliers⁵⁷".

🎯 BUDGET 2023 ASK

- ✓ Double the current NO_x level rate and apply to both category A and B vehicles to yield an estimated extra €120m

⁵⁶ Parliamentary Question 24319/22 24320/22 24321/22

⁵⁷ O'Sullivan, Kevin (2021). Ireland needs water charges to meet environmental targets, OECD warns. Irish Times. Available here: <https://www.irishtimes.com/news/environment/ireland-needs-water-charges-to-meet-environmental-targets-oecd-warns-1.4560401>



THREAT

Urban cities choking from stifling levels of private vehicle congestion

Before the onset of the pandemic, Dublin was ranked the 6th most congested city in Europe⁵⁸ and as traffic levels are returning to pre-pandemic levels, with fewer using public transport⁵⁹, Dublin still stands as the 16th worst city in the world for traffic congestion⁶⁰. Moreover, Limerick ranks as the 71st top congested city globally while Cork stands at 100⁶¹. Evidently, our major urban areas are choking with traffic levels and more measures are needed to deter private vehicle use and encourage active travel (walking, rolling, cycling, and public transport).

ACTION

Reduce private motor vehicle usage in major urban areas

Other congested European cities saw a reduction in traffic levels cities by implementing a congestion pricing charge. Stockholm in Sweden, a similar-sized city to Dublin, saw a 20% reduction in daily traffic since congestion charges were introduced⁶². In London, traffic entering the original charging zone remained stable at 27% lower than pre-charging conditions in 2002 while cycling rose by 66% after the scheme was brought in⁶³.

To see similar results, and as recommended by the OECD, the government's Commission on Taxation and Welfare⁶⁴, and the Oireachtas budget oversight committee⁶⁵, a daily congestion charge should be introduced in Dublin city centre and the government should explore the feasibility of extending similar charges to other major urban areas such as Cork, Limerick, and Galway city.

BUDGET 2023 ASK

- ✓ Implement a daily congestion charge on all private motorised vehicles entering Dublin city centre and examine the feasibility of extending similar congestion charges to other major urban areas

58 Daly, Adam (2020). Dublin is the 6th most congested city in Europe. The Journal. Available here: <https://www.thejournal.ie/dublin-traffic-congestion-4985027-Jan2020/>

59 McCormack, Cian (2022). Road traffic numbers hit pre-pandemic levels, but fewer use public transport. RTE news. Available here: <https://www.rte.ie/news/ireland/2022/0207/1278254-traffic-levels/>

60 Quinn, Eamon (2021). Dublin is 16th worst in the world for traffic congestion – Inrix survey. Irish Examiner. Available here: <https://www.irishexaminer.com/business/economy/arid-40761615.html#:~:text=%EF%88%B2%20EF%83%A1%20EF%83%A0-,Dublin%20is%20the%2016th%20worst%20for%20traffic%20congestion%20in%20the,according%20to%20a%20major%20survey.>

61 Fox, Kenneth (2021). Dublin among top 25 most congested cities in the world. [Online] Available from: <https://www.breakingnews.ie/ireland/dublin-in-top-25-of-the-most-congested-cities-in-the-world-1063640.html>

62 Eliasson, Jonas. (2014) Stockholm's Congestion Pricing. Centre for Transport Studies. Available here: <https://www.toolsofchange.com/userfiles/Stockholm%20Congestion%20Pricing%20-%20FINAL%202014.pdf>

63 Transport for London. Congestion charge factsheet. Available here: <https://content.tfl.gov.uk/congestion-charge-factsheet.pdf.pdf>

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THREAT

Strict criteria to access bike-to-work scheme

The bike-to-work scheme provides an exemption from benefit-in-kind (BIK) where an employer purchases a bicycle and associated safety equipment for an employee. While the scheme was expanded in recent years so the exemption applies to the first €1,250 of expenditure incurred by the employer in obtaining a bicycle and related safety equipment, and for e-bikes the exemption is higher at €1,500⁶⁶, only PAYE workers can avail of it.

ACTION

Expand the criteria able to access the bike-to-work scheme

Incentivising as many groups and individuals in Ireland to purchase bicycles and take up cycling will be crucial to shifting private vehicle usage to more sustainable forms of transport such as cycling. To achieve this, more individuals, beyond PAYE workers must be able to access the bike-to-work scheme.

BUDGET 2023 ASK

- ✓ Expand the Cycle to Work scheme beyond PAYE



66 Citizens Information. (2022). Bike to work scheme. [Online] Available from: https://www.citizensinformation.ie/en/travel_and_recreation/cycling/cycle_to_work_scheme.html



! THREAT

Lack of safety for children cycling to school

According to CSO figures, there has been an 86% drop in the number of children cycling to school⁶⁷. To reverse this trend, the Safe Routes to School (SRTS) programme was launched last year. The appetite from schools seeking to avail of this scheme was enormous. By the deadline of 16th April 2021, 932 applications had been received from schools in every county in Ireland, yet only 170 could be accepted in the first round. The remaining 762 schools will be accepted in the subsequent rounds.

📋 ACTION

Boost funding to Safe Routes to School programme

Creating safe infrastructure will be vital in instilling a culture of healthy active travel into the newest generation and ensuring that more school children make their own way to school by foot, wheel, or bike. Budget 2023 must allocate additional funding for the SRTS programme so that this can be achieved⁶⁸.

🔄 BUDGET 2023 ASK

- ✓ Increase the level of funding allocated to the Safe Routes to School programme for 2023 to accelerate implementation and that more schools can avail of it and create additional roles across An Taisce and the NTA to support this initiative



67 Irish Examiner (2019). 86% drop in children cycling to school. [Online] Available from: <https://www.irishexaminer.com/news/arid-30942858.html>

68 Parliamentary question 24281/22



! THREAT

Return of high fares for public transport

In light of rising inflation and the continued cost of living crisis affecting large cohorts of the population, the Government introduced a 20% average fare reduction on all Public-Service-Operator (PSO) services until the end of 2022. Furthermore, in recognition of the importance of incentivising young people to use public transport, a 50% discount on all services was brought in for the young adult card (YAC) applicable to those aged between 19 and 23 years old.

📋 ACTION

Guarantee the permanent reduction of all fares and explore the financial feasibility of further discounts

A combined €79 million of exchequer funding was secured for the introduction of these discounted fares⁶⁹, and according to the National Transport Authority (NTA), in the first three weeks when the 20 per cent discount was available on Bus Éireann services, passenger journeys climbed by nearly 10 per cent in the regional cities, with Galway and Limerick now ahead of pre-Covid levels⁷⁰. Welcomed by commuter groups, to continue this shift to public transport, the reduced fares must be made permanent⁷¹.

🔄 BUDGET 2023 ASK

- ✓ Allocate annual funding to the NTA to guarantee the 20% reduction on all PSO general fares, and the 50% YAC discount is made permanent
- ✓ Explore the feasibility of funding further fare reductions to boost public transport passenger numbers

69 Parliamentary Question 24289/22, 23290/22, 24291/22

70 Ni Aodha, Grainne (2022). Public transport fares reduced by 20%, with 50% discount for young adults. Irish Examiner. [Online] Available from: <https://www.irishexaminer.com/news/arid-40868732.html>

71 Bowers, Shauna (2022). Commuters welcome reduction in public transport fares. Irish Times. [Online] Available from <https://www.irishtimes.com/news/ireland/irish-news/commuters-welcome-reduction-in-public-transport-fares-1.4873671>



⚠️ THREAT

Pedestrians and cyclists at risk from large private vehicles

With one car for every two people nationally, it is evident that a car commuter culture is heavily ingrained in Ireland. Over the past few years, however, there has been a growing trend of fuel-hungry sports utility vehicles (SUVs) dominating Irish roads. In 2021, nearly 55,000 were sold accounting for 55% of all new cars, 19,000 of which sold in Dublin despite their off-road features.

The greater weight and height of these vehicles mean they emit about 20% more carbon dioxide than medium-sized cars. Moreover, their larger size makes them a severe hazard to active travel users. Evidence has shown that SUVs have an 11-times increased risk of rolling over in an accident and children in SUVs are twice as likely to die in that accident.

📋 ACTION

Deter the purchase and use of heavier, dangerous vehicles through financial disincentives

Pedestrians and cyclists must feel confident to walk and pedal on Irish roads in safety. In its report to the Department of Finance, the Commission on Taxation and Welfare, recommended introducing a system of taxation levies the weight of vehicles, under a user-pays principle, thus raising revenue lost from the decline in traditional motor tax and encouraging a shift to low-carbon economy⁷².

🎯 BUDGET 2023 ASK

- ✓ Introduce a system of taxation that levies the weight of vehicles, under a user-pays principle



⁷² Burke-Kennedy, Eoin (2022). Hike property taxes and impose congestion charges, tax commission says. Irish Times. [Online] Available from: <https://www.irishtimes.com/business/2022/07/05/hike-property-taxes-and-impose-congestion-charges-tax-commission-says/>



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