

National Bargee Travellers Association

**Consultation response:
Expanding the Warm Home Discount Scheme 2025/26:
Department of Energy Security and Net Zero (ESNZ)
19th November 2025**

1 INTRODUCTION

This consultation response is from the National Bargee Travellers Association (NBTA). The NBTA is a volunteer organisation formed in 2009 that campaigns and provides advice and support for itinerant boat dwellers on Britain's inland and coastal waterways ("Bargee Travellers"). This includes anyone whose home is a boat and who does not have a permanent mooring for their boat with planning permission for residential use. The NBTA is the only national organisation in Britain dedicated to upholding and defending the rights of itinerant boat dwellers.

The NBTA has over 2,200 members spread across all the major navigation authorities' waterways and beyond. The NBTA is a widely recognised 3rd sector organisation, has a casework team of 25 volunteer caseworkers and deals with at least 200 individual casework cases each year.

The navigable inland waterway system in Britain is home to an estimated 15,000 to 50,000 Bargee Travellers. There are as yet no accurate statistics for the number of people living on boats either with or without a permanent mooring in the UK. In spite of the fact that people have been living on boats since the late 18th century even as recently as the National Census of 2021 did not properly engage statistics-gathering of the boat-dwelling demographic and the above population figure is a very coarse number.

There are at least 21 inland navigation authorities in the UK. Canal & River Trust is the largest, with around 80% of the UK's inland waterways. Other significant navigation authorities are the Environment Agency; the Broads Authority; the Conservators of the River Cam; the Middle Level Commissioners; Peel Holdings (the Bridgewater Canal) and British Waterways Scotland (trading as Scottish Canals). An unknown number of Bargee Travellers live in coastal harbours and estuaries, some of which are controlled by harbour authorities.

2 MARKET REVIEW – BOTTLED GAS vs MAINS GAS

People who live on their boats and are itinerant have no fixed relationship with the canal or river bank and so all energy products are delivered to the boat as follows:

FUEL TYPE	DELIVERY METHOD	SOURCE
Diesel: red or white (for propulsion, generation and heating)	barrels pumped	local garage / other retail outlet; "coal boat", marina / boat yard
Gas: propane or butane / LNG / LPG (for water heating and cooking)	self-filled bottles replacement (refills) bottles	"Autogas" retailer (petrol station); "established" retail outlet (eg garden centre, petrol station); "coal boat", marina / boat yard
Coal (for water heating)	sacks	retail outlet (eg petrol station, garden centre); coal merchant "coal boat", marina / boat yard
Wood	sacks self-delivered	retail outlet (eg petrol station, garden centre); coal merchant "coal boat", marina / boat yard tree surgeon self-foraged

95% of boats now have solar panels. At times when the sun is not shining and in particular in winter when light levels are low electricity generation is achieved by running the ships engine (very common), running an external generator (common) or by use of a wind turbine (less common).

An analysis of (a) the spot price for LNG futures, (b) the OfGem price cap (c) the cost of retail gas supplies (19 data points) and (d) the retail cost of AutoGas (4 data points) has revealed some stark comparisons as follows.

- 1 The spot market price for LNG now shows a price of approximately £0.8204 / Therm or £0.02799 KWh. This equates to between £0.36108 / Kg equivalent and £0.38907 Kg equivalent (relying on a calorific content value of LNG of between 12.9 and 13.9 KWh / Kg)
- 2 The OfGem cap for mains gas stands at between £0.8114 / Kg and £0.8743 / Kg (the Ofgem cap for mains gas currently stands at £0.0629 / KWh). This amounts to a gross margin of 125% on the part of the energy suppliers. In a normal retail context this is obscene but not uncommon.
- 3 Off-mains-gas-grid households (including inter alia park homes, static caravans and caravans used by the travelling community but specifically not boats) usually use 47Kg bottled gas. The price of propane gas in retail 47Kg bottles ranges between 1.5x and 2.6x that of the OfGem cap for mains gas (5 data points).
- 4 A full 47Kg bottle has a gross weight of nominally 70Kg which is too heavy for an average person to lift. Deliveries of 47Kg bottles usually involve a flat-bed truck equipped with a Hiab and the bottles are lifted off onto a trolley. This is not

feasible on the towpath. This mass also dramatically affects the trim of a boat. Further the bottles stand too high to be of practical use on a boat.

- 5 LPG is heavier than air so sinks in the atmosphere. In a boat, in normal circumstances, escaped gas will sink into the bilge and present an explosive atmosphere. The mandatory Boat Safety Scheme regulations therefore specify that gas bottles must be kept in a gas locker that includes a drain to the outside of the boat (and must therefore be above the waterline) which in practical terms means in a location that is higher than the waterline but below the line of the roof. In practical terms this precludes the use of 47Kg bottles which stand over 1.5m high.
- 6 It is far more usual to see boats equipped with 13Kg propane (orange) bottles. Caravans and camper vans regularly use 3.9Kg bottles (and have similar gas lockers with external drains but for this size bottle) but this size exacerbates the price / Kg metric.
- 7 This study found that the ratio between the illicit Autogas filling of 13 Kg propane bottles ranged between 1.2x and 2.3x that of the OfGem cap (6 specific data points and use of the fillpg.co.uk website, that is country-wide).
- 8 Retail supplied exchange / refilled 13Kg bottles ranged between 3.7x and 5.1x the OfGem price cap (11 datapoints). These multiples are also obscene.
- 9 The lower end of this range in Item 8 above is occupied predominantly by specialised retailers, some coal merchants and some marine retail locations (eg boat yards) whereas the upper end is occupied by the higher cost marine establishments (premium chandlers). In the boating world we refer colloquially to "marine tax": the premium prices for items sold through some chandlery establishments.
- 10 What also stands out is that the supplier that features predominantly in the upper part of this subdivision of the data set Item 8 above is Calor. In the marine environment "coal boats" (that sell diesel, gas, coal and wood, for retail delivery in their "patch", to boat customers as they pass by) sell almost exclusively Calor bottles. Therefore, because of the effect of the £60 deposit per bottle, boat dwellers are essentially locked into the purchase of Calor 13Kg bottled gas.
- 11 The NBTAs holds a database of the contacts of 63 coal boats that work the inland waterways throughout England, Wales and Scotland. While these have not been contacted for current spot prices for their gas supply past experience has shown that the large number of coal boats, that have been used by members asked, are selling exclusively 13Kg Calor bottles at a retail price mid-way up the band identified in Item 8 above.
- 12 In Item 7 above reference is made to "illicit filling" of gas bottles. This is done by using a "bayonet to UK-POL" converter that is screwed into a conventional propane bottle and the bottle is then filled using a conventional bayonet-mating forecourt LPG pump. Calor prohibit the filling of their bottles by anyone other than themselves. As Calor owns AutoGas (which is the company that supplies the majority of forecourt LPG) in what is ostensibly a monopoly Calor also controls how the forecourts operate.

- 13 About 2 years ago there was a major shake-up in retail LPG supply imposed by AutoGas (on Calor's say-so) and a large number of retailers withdrew from LPG sales. AutoGas then removed their bulk storage tanks from these forecourts.
- 14 A relatively small number of forecourt operators then installed their own bulk tanks and secured contracts directly with importers bringing LNG into inter alia Immingham. The basis for this shake-up appears to stem from Calor's restrictive commercial practice.
- 15 In particular it is possible to purchase (not from Calor) a 13Kg gas bottle referred to as "SafeFill" fitted with a control valve that prevents overfilling. In contrast and in accordance with the HSE requirements, someone filling for example a Calor bottle must be trained so as to not overfill the bottle. The NBTA has seen notices in forecourt kiosks forbidding the forecourt attendant from authorising LPG pumps for the filling of Calor bottles (which are distinctively orange in colour) but are supposed to authorise the filling of SafeFill bottles. There is plenty of anecdotal evidence on social media that suggests that the filling of SafeFill bottles is also being prevented which is thus a restrictive and anticompetitive practice.
- 16 A SafeFill bottle retails for approximately £150. Assuming a gross margin in the supply chain of 150% on the manufacturing cost (in itself excessive) this assumes a production cost of in the order of approximately £60. This is consistent with the value of the deposit on a Calor bottle.
- 17 Calor claims that its "premium" retail price (although it never discloses in clear terms exactly how much the premium is) covers the capital cost of producing the orange bottles and refilling them. The NBTA estimates that the average cost of a 13Kg Calor bottle refill is £48.79 (from the above data set). If these bottles were filled at an LPG pump the average fill price would be £19.89. This gives rise to an average superprofit of £28.90 per fill / swap. Assuming a bottle life of 10 years and 5 fills a year (or more – Calor regularly embargoes sales of 13Kg bottles because it claims that it has "run out of empties") this implies a lifespan profit of £1,445 or a rate or return on the capital cost of 24x the production cost. This is not "covering the cost of production" but is gross profiteering.
- 18 Therefore the NBTA concludes that while the Warm Homes Discount is extremely relevant to boat dwellers an equally predominant factor that affects the purchasing ability of itinerant boat dwellers is the gross profiteering of Calor. This is something that, approximately 10 years ago, the NBTA brought to the attention of the Competition and Markets Authority but no action was taken that had any form of real effect on Calor.

3 RESPONSES TO SPECIFIC QUESTIONS

Q1: Do you agree with our proposal to continue the Warm Home Discount scheme supporting households at risk of fuel poverty for the next scheme period from 2026/27? Please provide any reasoning/comments/evidence to support your view.

Yes. The general position of the NBTA is that itinerant boat dwellers are in general a disadvantaged demographic; any support is vital and so far there have been deliberate policy-based exclusions of this demographic.

Q2: Do you agree with our proposal to rename the current 'Core Group 1' and 'Core Group 2' in England and Wales, bringing the existing groups together under one 'Core Group'? Do you have any views on whether this approach could bring any potential advantages or disadvantages, including practical considerations in delivering the scheme?

The NBTA disagrees with this proposition. How the different demographics are described is an administrative matter. However with EBSS there was EBSS and EBSS-AF followed by "EBSS for CRT mooring holder licensees". It follows that there are insufficient categories so a more appropriate treatment would be a workflow-based inclusion rather than changing the names. The NBTA recommends at least (a) a category described as "itinerant household" and (b) a catch-all for "everything else not already covered", perhaps means-tested. The NBTA is not equipped to comment on the design of a gov.uk interface. The NBTA did design modifications to the EBSS-AF gov.uk interface and these suggestions were ignored.

Q3: Under these proposals the eligibility criteria established for 2025/26 would be continued for the next scheme period in England and Wales. Do you have any concerns about the impact of this proposal on households, in particular on those with protected characteristics? 6 What concerns do you have? Do you have any suggestions for mitigating your concerns, including through use of Industry Initiatives? Please provide any evidence you may have to support your answer.

The eligibility criteria are discriminatory on the grounds of Art 14 ECHR "other designation" (boat-dweller). The NBTA holds four independent counsel's opinions underpinning this assertion. If a compliance review was performed and this point was overlooked then the compliance review was faulty. In addition ESNZ is also excluding people with disabilities, pregnant mothers, families with new children, etc by reason of a blanket exclusion of people who are "off-grid". In relation to EBSS-AF 8 NBTA clients were preparing to engage in judicial review on the grounds of discrimination. The counsels' opinions referred to above were supportive such that Legal Aid was authorised. The only reason that these matters did not proceed was because the claims fell "out of time".

Q4: Which of the three options listed above is your preferred option for the next scheme period in Scotland?

All of the above. The use of an eligibility statement provides the flexibility to change the scope year-on-year in the light of changing resources. However automatically selecting on the strength of the benefits in receipt is a straightforward selection process: people on benefits will be more than grateful for a grant provision for energy bills.

"Hard to Heat" properties might give rise to unexpected outcomes including wealthy people getting a grant where they are undeserving because, in any event, they have the capability to retrofit their homes with insulation and other energy-saving measures. In particular if the mandated "insulation guidance" element remains this is clearly a disincentive to not insulate: "get the grant but insulate your home and you pay". As a general principle this will not apply to boat dwellers as boats are usually built with significant insulation but with

mandatory fixed-open ventilation. “Hard to heat property” also implies a postcode and no itinerant boat has a postcode.

What is essential is a “catch all” that will guarantee that anyone (specifically an itinerant boat dweller) with genuine need is supported. This implies (a) a phone line (b) a set of criteria for selection (“itinerant boat dweller” would be a good start) and (c) discretion on the part of the DMs involved.

Q5: Do you have any views on the advantages, disadvantages or concerns of any of the options presented?

As above

Q6: Do you have any views about the use of a centralised Warm Home Discount helpline for auto matched Scottish consumers in options 2 and 3? Currently only the Core Group receives helpline support.

As above.

Q7: Do you foresee any practical challenges or have any delivery concerns with replacing the Broader Group and its application process in options 2 and 3 with a data matched broader Core Group?

Yes. Whatever is implemented will be imperfect so a provision of a “catch all” is required. A “catch all” measure will require personnel to administer it.

Q8: Do you have a preferred option for the next scheme period in Scotland that is not presented above? If so, please provide details.

As above.

Q9: Do you have any concerns about the impact of these proposals, including the three options as presented, on households, in particular on those with protected characteristics in Scotland? 15 What concerns do you have? Do you have any suggestions for mitigating your concerns, including through use of Industry Initiatives? Please provide any evidence you may have to support your answer.

As above and per comments for England and Wales.

Q10: Do you think there are advantages or disadvantages in setting out eligibility separately in Scotland?

Advantageous as laid out above.

Q11: Do you agree that Industry Initiatives should be continued into the next scheme period?

The NBTA has nothing to contribute to this question. The NBTA has laid out above the opposite of “initiative” on the part of Calor (in terms of anticompetitive conduct). There is no evidence available to the NBTA that suggests that any energy provider is capable of offering a scheme that actually helps the demographic of the NBTA.

Conversely Julian House, a homelessness charity in Bath, set up in cooperation with a coal boat a “pay it forward” scheme. This enabled people with the inclination to contribute to a money pot held by the coal boat. People in need could request fuel from the coal boat paid for from the “pay it forward” pot. This scheme was developed in spite of the energy providers not because of them.

Q12: Do you agree that Industry Initiatives should continue to be designed by individual energy suppliers and third-party partners? What are the benefits and drawbacks of this approach?

It would be good if the energy providers that supply the boating community were inclined to create schemes that might benefit the demographic.

Q13: Do you have any proposals to improve the design and/or delivery of Industry Initiatives in the future? Do you have any proposals for additional activities that would be of benefit to include as permissible Industry Initiatives in the future?

A forum attended by the energy providers in which ideas can be shared and developed. The NBTA is sceptical but a “carrot and stick” approach might be useful. The starting point would be for the itinerant boat dwelling community to be in scope and secondly for the energy providers to actually engage in discussion.

Q14: Do you have any views on eligibility for Industry Initiatives, or the extent to which energy suppliers should have discretion and flexibility to who they are awarded to within fuel poverty risk groups?

Anything helps as long as it is not discriminatory.

Q15: Do you have any views on whether specified activities should be included in the new regulations for the next scheme period from 2026/27? Are there any advantages or drawbacks to their inclusion in your view?

As a policy decision the issue of whether the energy suppliers should provide discounts versus DWP paying for full-rate tariffs is a matter for the Executive and the Treasury and involves macroeconomic issues.

However wherever “full-tariff” prices are paid to a private sector actor by means of a benefit payment this amounts to value transfer from tax payers (who by majority will be lower down the wealth scale) to the shareholders of the energy provider (who inherently will be higher up the wealth scale) and is therefore abhorrent to a pro-socialist (or purportedly pro-socialist) administration.

It is clear that the consequences of the pro-neoliberalist policies of the Cameron / May / Sunak administrations have caused deeply penetrating and pernicious damage to the national economy.

In terms of things that could be included in the regulations mandating the energy providers to implement given measures the NBTA proposes that Calor in particular should be bound to the OfGem price cap.

Q16: Do you agree with the proposals to expand the role of suppliers in the communications around Warm Home Discount? Does this approach raise any advantages, or concerns in your view?

If all energy providers (including Calor and the other suppliers of energy products that supply the itinerant boat dwelling community) are obligated to promote WHD this might focus minds in relation to tariffs.

Q17: Do you have any views on appropriate governance arrangements or oversight to monitor the effectiveness of this approach?

At the moment the view of the NBTA is that “governance” of the energy sector that focusses on the households of itinerant boat dwellers is simply “absent” so anything is better than nothing. The issue is not something for the energy providers to be obligated to undertake by DESNZ itself.

Q18: Do you have any views on the proposed change to how the Warm Home Discount cost is estimated for reflecting in retail gas and electricity prices, moving from an annual spending target set out in regulations to the introduction of estimates of total spend for that coming winter? Do you have any views on how this may work on a practical level for suppliers? If your response is specifically relevant to England and Wales, or Scotland only please make this clear in your reply.

The NBTA has no comment to make here.

Q19: Do you have any views on how to determine spending for Industry Initiatives in Scotland if data matching is adopted in place of the Broader Group?

The NBTA has no comment to make here.

Q20: Do you agree, in the absence of data matching, Scottish spending should continue to be determined as a proportion of expected spending in the England and Wales?

The NBTA has no comment to make here.

Q21: Do you agree that Industry Initiatives should be funded to a similar level as currently? Do you have any views on whether their value should be adjusted for inflation during the scheme period?

The NBTA does not agree that the public sector should fund private sector initiatives at all. In the specific case of Calor the NBTA takes the view that Calor’s superprofits should be curbed and what surplus remains available should be used to fund further pricing discounts for residential / household consumption. The NBTA takes the view that the gross margin earned (between the spot wholesale price and the retail price) is obscene, it is Calor that takes the bulk of this gain and it is the least well off households that carry that burden.

Q22: Do suppliers have any views on whether the reconciliation process works as currently organised? Do you consider whether any changes could improve the process?

The NBTA has no comment to make here.

Q23: Do you have any other comments, views or evidence on the proposals for the changes to the levy?

The NBTA has no comment to make here.

Q24: Do you have any comments on the proposal for allowing rebates notices to be issued after 1 March (31 March for 2025/26) where the Secretary of State is satisfied that an error has occurred?

The NBTA takes the view that this question (or indeed the underpinning logic behind it) is phrased incorrectly and the logic is inverted. The rebate is needed to carry people who are least well off through the winter. Therefore paying the rebate in the following spring is misplaced. Therefore fixing errors in retrospect is also misplaced. This was the fundamental fault with logic behind the EBSS-AF scheme. Instead the rebate should be applied in advance and errors mopped up sometime afterwards (potentially without time limit).

Q25: During the scheme period between 2026/27 and 2030/31, do you have any suggestions on what further improvements or additions to the scheme we could be exploring?

The NBTA has no comment to make here.

Q26: Are there in your view households with particular characteristics that are or will be particularly impacted by changes to the energy sector and how costs feature in bills?

The NBTA has laid out in this submission how the itinerant boat dwelling community has been passed over in relation the WHD.

Further the NBTA made detailed submissions on 23-03-2025 in relation to the first cycle of consultation by DESNZ and it is apparent from the DESNZ consultation document 22-09-2025 that none of the input provided by the NBTA has been heeded.

Put another way:

- “(a) DESNZ is obligated to have regard to input from a consultee – which it has not;
- (b) why bother consulting if none of the input provided to DESNZ by bona fide consultees goes anywhere?; and
- (c) if DESNZ has no interest in consultee input then what incentive has the consultee got in bothering to make submissions?”

The NBTA draws the attention of DESNZ that 8 claimants were preparing to engage in judicial review proceedings against BEIS in the summer of 2023 after the EBSS-AF scheme debacle. It seems as if no lessons whatsoever have been learned from this. The NBTA will be obliged if DESNZ will think again over its stance and policies towards itinerant boat dwellers in the context of the WHD.

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