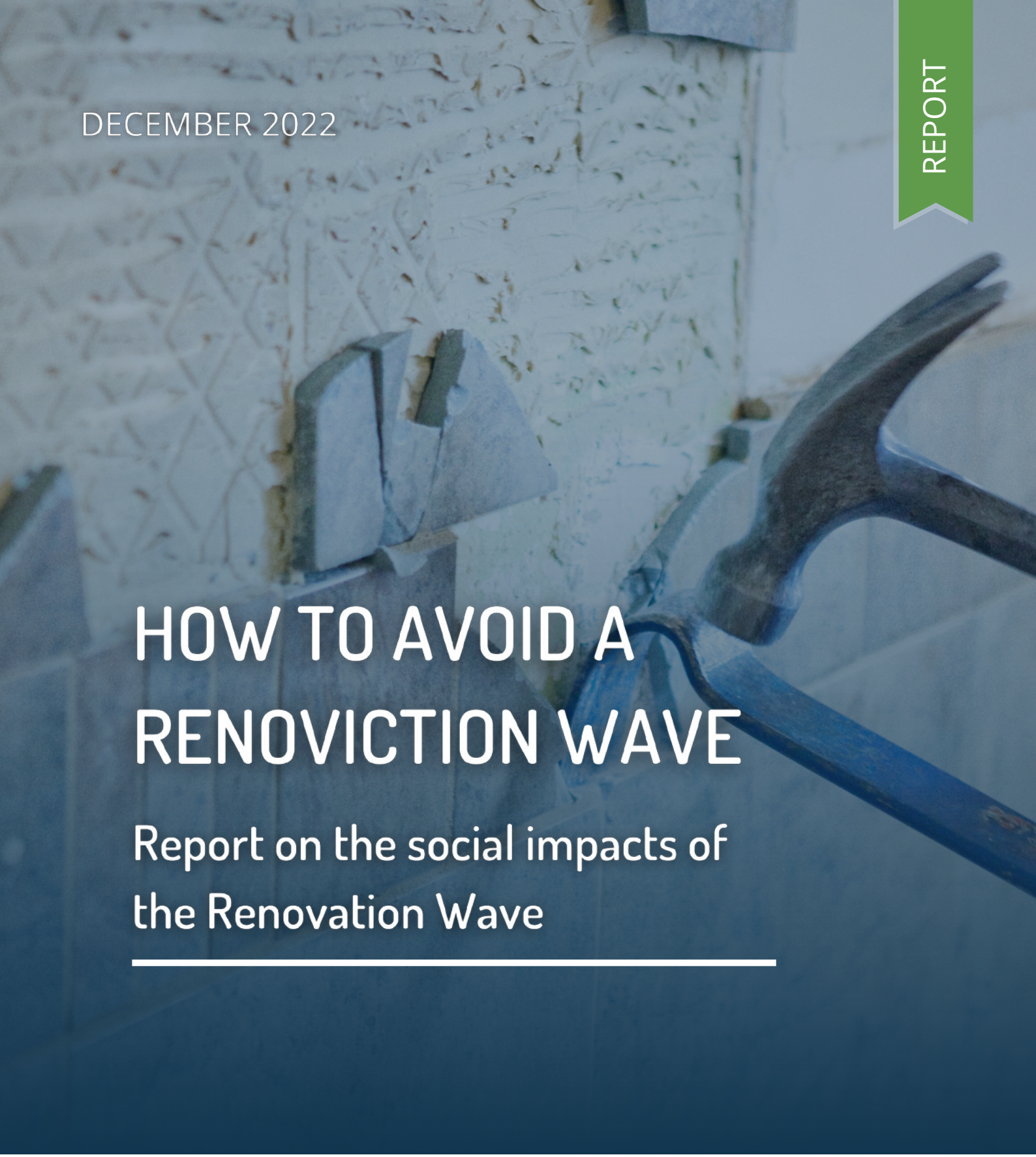

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REPORT

HOW TO AVOID A RENOVICTION WAVE

Report on the social impacts of the Renovation Wave

FEANTSA

European Federation of National Organisations Working with the Homeless

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1 Introduction

In recent years, housing, and utility expenditures (including water, electricity, gas, and other fuels) grew fast for European households between 2020 and 2021, accounting for more over a quarter (25.7%) of total spending, an increase of 2.2 percentage points in only one year. Tenants who pay market rents are particularly affected: in the EU27, more than one-fifth of private tenants spend more than 40% of their income on housing, and fear rising costs (Fondation Abbé Pierre-FEANTSA et al., 2022). Every night, at least 700,000 people experience homelessness, an increase of 70% over the last ten years.

At the end of 2020, as part of its Green Deal, the European Commission proposed a pan-European strategy for housing renovation and the decarbonisation of heating and cooling public buildings and social infrastructure, the EU Renovation Wave. It has become a blueprint for further policy action on energy poverty and against worst-performing buildings.-

Energy poverty, a situation closely linked to unfit and substandard housing, is expected to increase dramatically due to the explosion of energy prices since 2021. This phenomenon is often presented as a trade-off between "heating and eating", corresponding to the inability of a household to meet its energy needs (from heating to cooling, cooking, and running appliances). This is primarily due to low incomes, high energy prices, and the poor energy performance of the housing. Inefficient dwellings use more energy to reach an acceptable temperature – and those with the lowest incomes usually inhabit them. Extensive literature and policy documents inform their dramatic social and health consequences for at least a fourth of the European population. As energy prices increase, renovation programmes and policies to improve housing conditions have multiplied.

However, analyses of the implemented housing renovation programmes and policies are raising several social concerns, one being particularly dangerous: some retrofitting policies and programmes, far from increasing living standards and making more quality affordable housing available, push the most vulnerable households to be evicted from their homes due to rent increases. This phenomenon is known as renoviction. Could the Renovation Wave trigger a Renoviction Wave? And what could EU and national policymakers do to avoid it?

FEANTSA is at the forefront of helping to defend the right to decent housing and protecting citizens from homelessness and poor housing. FEANTSA commissioned this report to inform its work on the European Renovation Wave and the revision of the Energy Performance of Buildings Directive (EPBD). The report aims to highlight some potential social risks associated with renovation programmes and energy performance standards and identifies strategies to avoid or mitigate these risks. This work draws on existing FEANTSA work, existing literature, and direct communication with experts in the sector. Examples of completed renovation policies and programmes illustrate positive and negative outcomes. The report also performs a deep dive into national minimum energy performance standards that are currently discussed at the EU level. The report concludes by recommending several fundamental principles to be applied in the design of energy renovation programmes and energy performance standards to maximise the social benefits and avoid the risk of renoviction and other adverse outcomes.

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WHAT IS THE RENOVATION WAVE? EUROPEAN POLICY CONTEXT

In Europe, buildings account for about 40% of energy consumption and 36% of CO2 emissions. According to the EU, three-quarters of the EU's housing stock is energy inefficient: homes are too cold in winter and too hot in summer. However, only 0.4 to 1.2% is renovated yearly (European Commission, n.d.). Building renovation is necessary to achieve the carbon emissions reduction targets, reduce energy demand and make the EU more resilient to climate change while protecting citizens from energy poverty. The war in Ukraine highlighted that the renovation of buildings is a necessary step to reduce the EU's energy dependence on Russian hydrocarbons and shield citizens from geopolitical instability. Massive improvements in dwellings' energy efficiency have become an absolute priority.

The Communication on the Renovation Wave and the Recommendation on Energy Poverty (October 2020)

In October 2020, amid the COVID pandemic, the Commission presented its strategy for the Renovation Wave to accelerate the pace of renovation in the Union (European Commission, 2020a). The Renovation Wave has three priorities: tackling energy poverty and the worst performing buildings, improving public buildings and social infrastructure, and decarbonising heating and cooling technologies. With this document, the EU sets the ambitious target of doubling annual energy renovation rates over the next ten years. This has the potential to improve the quality of life of people living in buildings and create many jobs (European Commission, n.d.).

The Recommendation on Energy Poverty accompanies the Renovation Wave. It recognises the prevalence of energy poverty, accentuated by the COVID-19, acknowledging that at least 34 million Europeans cannot adequately warm their homes – despite the difficulty to measuring precisely the extent of the phenomenon. It diagnoses that energy poverty comes from low incomes, high costs and energy inefficiency, "in combination with a broad range of socioeconomic factors associated with general poverty and issues arising from housing tenure systems". Overall, it assesses that quality housing and thermal comfort are deemed critical to good health and, overall, a decent life (European Commission, 2020b).

The document explicitly acknowledges the heating needs of public buildings such as schools and hospitals, social housing, and entire neighbourhoods beyond individual buildings (page 10), but without mentioning collective accommodation (e.g. emergency accommodation, refugee centres, shelters) or unfit housing.. It also fails to acknowledge that many of the worst housed people in Europe are in the private sector. The Commission also introduced the Affordable Housing Initiative to ensure that local social housing initiatives receive essential technical capability. It aims to pilot 100 lighthouse refurbishment districts in a "smart neighbourhood approach" and give blueprints for replication, putting liveability and cutting-edge innovation first. In the past year, the Commission has also shared a series of emergency measures to tackle high prices and will present additional steps in the fall of 2022 (Taylor, 2022).

To make successful renovation programmes happen, the Renovation Wave underlines the involvement of stakeholders, starting with national political forces, energy and construction companies, banks and (social) organisations working on the ground. It calls for an expansion of the usage of energy service companies (ESCOs) and energy performance contracts to renovate social housing. One-stop shops, and local information points, are presented as vectors to ease access and boost the quality of the work performed (European Commission, 2020a). This document series also covers the financial mechanisms that could be mobilised, such as the Just Transition Fund.

Revision of the Energy Performance of Buildings Directive (EPBD)

More than a year later, in December 2021, the European Commission proposed revising the Energy Performance of Buildings Directive (EPBD). Overall, this revised directive (previous versions date from 2010 and 2018) aims to accelerate the energy renovation of the worst performing buildings and reduce the carbon footprint of buildings to achieve a highly energy efficient and decarbonised building stock by 2050 (European Commission, n.d.), also defined as a "net-zero building stock"[1]. Buildings should be able to be self-sufficient, use renewable energy, or even produce surplus energy for other uses. It should help the EU reduce emissions in the building sector by 60% by 2030 compared to 2015 (European Commission, 2021a).

One of the measures tabled concerns heating systems. The EPBD states that fossil fuel boilers will no longer be eligible for public subsidies from 2027. The proposal does not provide for a general ban but leaves it to the Member States to set more stringent requirements. Several Member States, such as Austria and Ireland, consider these measures essential for achieving a decarbonised building stock and improving air quality and health. Low-income households tend to be limited to cheapest investments and therefore sometimes end up locked into overly expensive and polluting appliances. Adjusting support measures seems to be a relevant way to avoid this situation.

The directive also proposes to Member States to establish social safeguards and financial support for households in energy poverty, as well as a high environmental impact measures, such as the increased deployment of solar energy and expansion of heat pumps (recital 20). The quality of the indoor environment becomes part of the overarching housing renovation picture (Article 7). The proximity and community (neighbourhood) dimension is also emphasised through district heating and cooling infrastructures based on renewable energy and local solutions (Article 1).

One of the flagship measures is the gradual introduction of minimum energy performance standards or MEPS (Article 5). MEPS is a system that mandates renovations for the worst-performing buildings, or those that fall under the Energy Performance Certificate (EPC) grades G or F. More or less every country's 15% poorest performing structures are given a G grade, with the remaining buildings spread equally among the other classifications between G and A (zero-emission buildings). In accordance with this proposal, public and non-residential buildings must be upgraded to a minimum energy performance level F by 2027 and a minimum level E by 2030. By 2030 and 2033, respectively, residential structures, including rented properties, shall be upgraded from G to at least F and E. Following that, and in line with their plan to attain a building stock free of emissions by 2050, Member States must next define precise deadlines for reaching higher energy performance classes through new National Building Renovation Plans. In accordance with their National Building Renovation Plans, they are also given the authority to set national MEPS.

Well intentioned, this measure could be a social risk if all precautions are not taken. Strong safeguards should be included to protect households from too much debt, renoviction, and housing exclusion.[2] For example, it should target unsafe and unfit housing, including the worst performing buildings and those inhabited by vulnerable and low-income people. Social safeguards should also prohibit landlords from raising rents beyond real energy savings.

1 According to the European Commission's website, a "zero emission building is defined as a building with a very high energy performance, with the very low amount of energy still required fully covered by energy from renewable sources and without on-site carbon emissions from fossil fuels"(European Commission, n.d.)

2 See for instance: Right to Energy Coalition open letter: Energy saving, gas saving, lifesaving, 19 October 2022 https://righttoenergy.org/wp-content/uploads/2022/10/Energy-saving-gas-saving-lifesaving-1.pdf

Besides, according to the European Commission[3], other relevant measures in the new proposal are:

- new standards for new and zero-emission buildings, as well as a definition of "deep renovation" to avoid shallow renovations, "mortgage portfolio standards" to incentivise lenders to improve the energy performance of their portfolio of buildings, and the introduction of "building renovation passports." There are concerns that this measure could make it more difficult for low-income households to access mortgage credit and further exclude them from housing market.
- A revision of the Energy Performance Certificates to make them more modern, reliable and comparable across countries. This is a way to address the non-economic barriers to energy renovations.
- more ambitious long-term renovation strategies, to be renamed national Building Renovation Plans.

Well intended, some of these measures however are not without social risk if not designed and implemented to benefit those facing energy poverty because of low incomes, high energy costs and poor housing conditions. .

Better acknowledgement of vulnerability in the revision of the Directive on Energy Efficiency

The Commission has also proposed specific energy efficiency objectives for vulnerable households and those in energy poverty in the European Commission's proposal recast for a directive on energy efficiency (COM(2021) 558 final – 14 July 2021). The Commission has included the first official (incomplete) definition of energy poverty (Article 2 (49)) and has proposed to broaden the understanding of "vulnerability" to be more inclusive of sex, gender, age, disability, race or ethnic origin, sexual orientation, religion or belief-based discriminations in accessing adequate housing and making use of their rights (Creutzfeldt et al., 2021). Recognising the broadness of vulnerability is a step in the right direction, but the definition does not include any mention of revenue. Overall, the Renovation Wave lacks clarity on who is considered vulnerable and how to approach them. It makes it challenging to set a comprehensive plan for how to provide help to low-income people who are still living in substandard homes.

FUNDING THE RENOVATION WAVE

Lack of financing remains one of the biggest barriers to performing socially-just renovation works. Up to 220 million buildings need to be renovated by 2050, which means that 150 to 275 billion additional investments are required per year. Some of these investments pay off quickly: the EU could save 50 billion euros in energy costs if it succeeds in meeting its energy efficiency targets, not to mention the impact on limiting inflation (FEANTSA, 2022a).

The European Commission has developed several financial instruments for renovations, that could partially benefit low-income households, such as[4]:

- The Recovery and Resilience Facility with an estimated 76 billion EUR dedicated to building renovation, including social housing;
- The Cohesion policy, historically the primary source of EU public funding for direct investment in improving buildings' energy efficiency. In June

3 Source: https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficient-buildings/energy-performance-buildings-directive_en

4 Thanks to Silvia Rezessy, policy officer at DG ENER, European Commission, for presenting those instruments during the Metropolitan Research Institute, Habitat for Humanity International and Habitat for Humanity Hungary and FEANTSA's site visit and expert meeting, in Budapest, 6-7th July 2022.

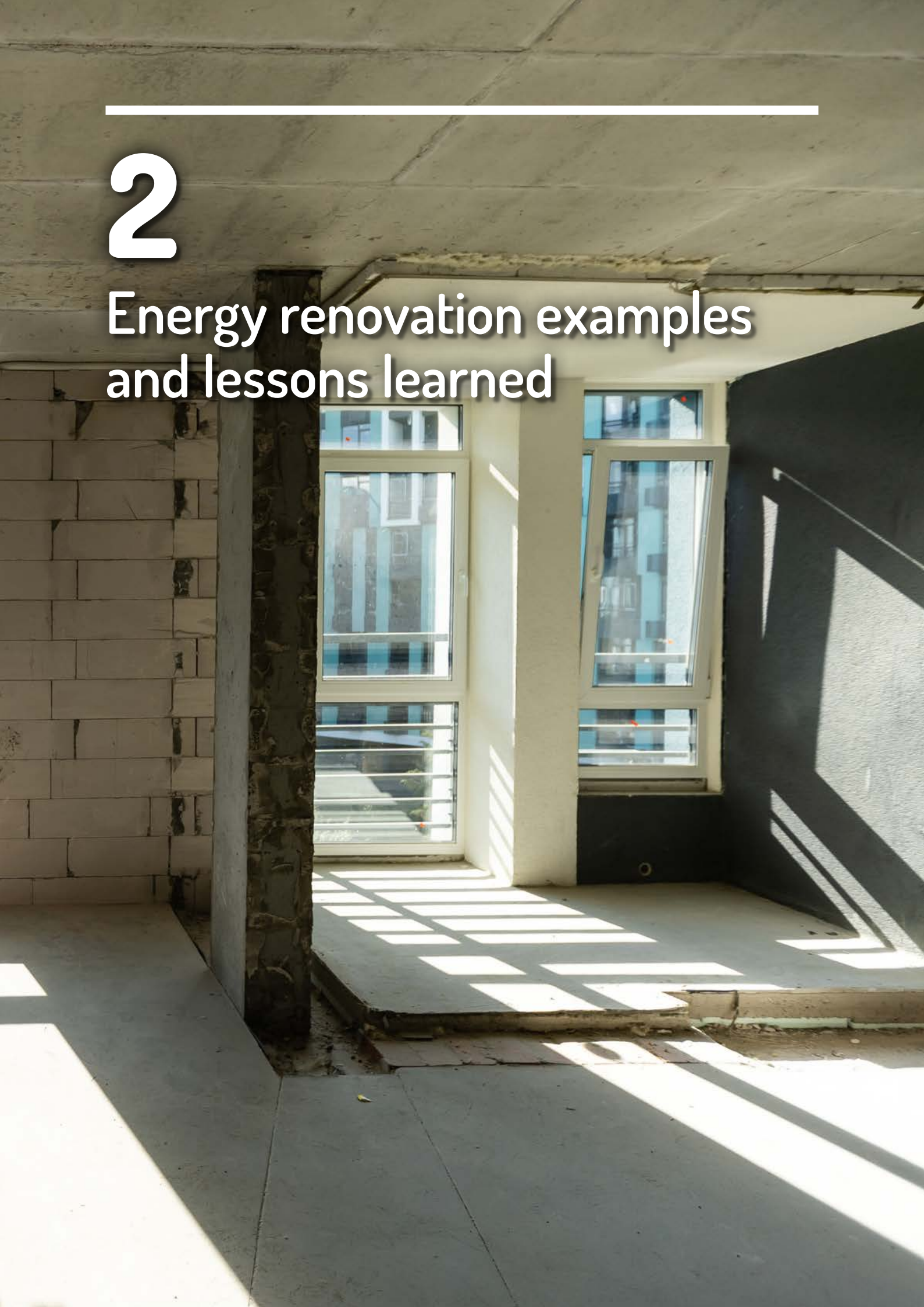
2022, the EU and EIB presented two new model financial instruments to support REPowerEU and New European Bauhaus. The models will assist and fund energy-efficient building projects and promote sustainable, equitable, and aesthetic territorial development (EIB, 2022).

- The Social Climate Fund (SCF), where the Commission proposes 72.2 billion EUR in 2025-2032. The fund can finance structural solutions to address root causes of energy poverty, such as building renovation and decarbonisation of heating and cooling meant to support vulnerable households. However, as FEANTSA has already pointed out, the amount is insufficient to make a significant impact on the situation. As the SCF is currently being reviewed in trilogue, boosting its size and ambition will help alleviate the crisis in climate, social, and energy security while also enhancing EU solidarity (Defard and Bergoënd, 2022).
- The Just Transition Mechanism, including the Just Transition Fund, provides targeted support to alleviate the socio-economic impact of the green transition in the most affected regions;
- Some other areas of interest are still lacking details on the amount of money allocated, such as the Affordable Housing Initiative is part of the Commission's Renovation Wave strategy for Europe, which aims to green buildings, create jobs and improve lives[5]; The LIFE-Clean Energy Transition sub-programme holistically addresses barriers to renovation, helps reduce energy poverty and improves building-related interventions in vulnerable areas Project development assistance; and Horizon Europe has 14 topics addressing the highly energy efficient and climate neutral EU building stock in the Work Programme 2021-2022, including eight cases addressing research and innovation activities for the broader sustainability of the built environment implemented under the European Built-4People.
- National Building Renovation Plans must also ensure sufficient funds and support to provide national-level finance and help leverage private investment.[6]

EU Member States are given access to the financial sources available on the European level, and it is up to them to choose how these funds should be allocated at the national and local levels. Among all of these sources, the European Commission has not earmarked any funds for the renovation of buildings that are occupied by lowest income groups, which means that these sources might, in reality, be used for competing national objectives. For FEANTSA, this is a missed opportunity that can and should be remedied in some way. For a social energy transition to be successful, there is an absolute need for specific, dedicated, and targeted financing to be allocated toward fixing the buildings with the worst energy performance that are occupied by those with the lowest incomes. It would enable both high environment and social impact.

5 See https://single-market-economy.ec.europa.eu/sectors/proximity-and-social-economy/social-economy-eu/affordable-housing-initiative_en

6 See for example Chapter 2.7.8. Energy poverty and related social policy measures in *Commission Staff Working Document: Analysis Of The National Long-Term Renovation Strategies* (SWD(2021) 365 final/2, Brussels, 6 December 2021) https://energy.ec.europa.eu/system/files/2021-12/swd-on-national-long-term-renovation-strategies.pdf



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Energy renovation examples and lessons learned

The examples below are from meetings and exchanges between FEANTSA and local experts and the author's research. This report is not exhaustive or to present a global view of renovation policies in the different MS. Instead, it aims to stimulate reflection on what it means to increase energy and climate-efficient renovations while creating a just transition. These examples, from Europe and North America, have been selected to illustrate different impacts and outcomes, both negative and positive, and may not be typical of energy renovations in general. Some are individual renovation programmes; others are carried out at the multifamily housing level. Some are "deep renovations", others could be considered as energy efficiency incentives. This report underpins some key issues to reflect on, such as the risks of gentrification, renoviction, or even "green mailing"[7].

Understanding the particular circumstances in which these projects will operate is crucial for predicting their potential ramifications, constraints, and opportunities. Measures are embedded in their local communities, as a place's social structures, climate, and architectural characteristics can significantly influence the energy poverty levels and ways to tackle them[8]. The scope for intervention in each context, which is directly related to the unique characteristics of each ownership regime, the political follow-up, the size of the stock of social and affordable housing, the laws and regulations, and the degree of tenant organisation and collective demands that characterise each context, does in fact explain the need for renovations, successes, or large-scale failures. Each example's level of detail was significantly different from the others; thus, they are not directly comparable. Some of the examples come from independent studies, while others are based on data provided by programme managers.

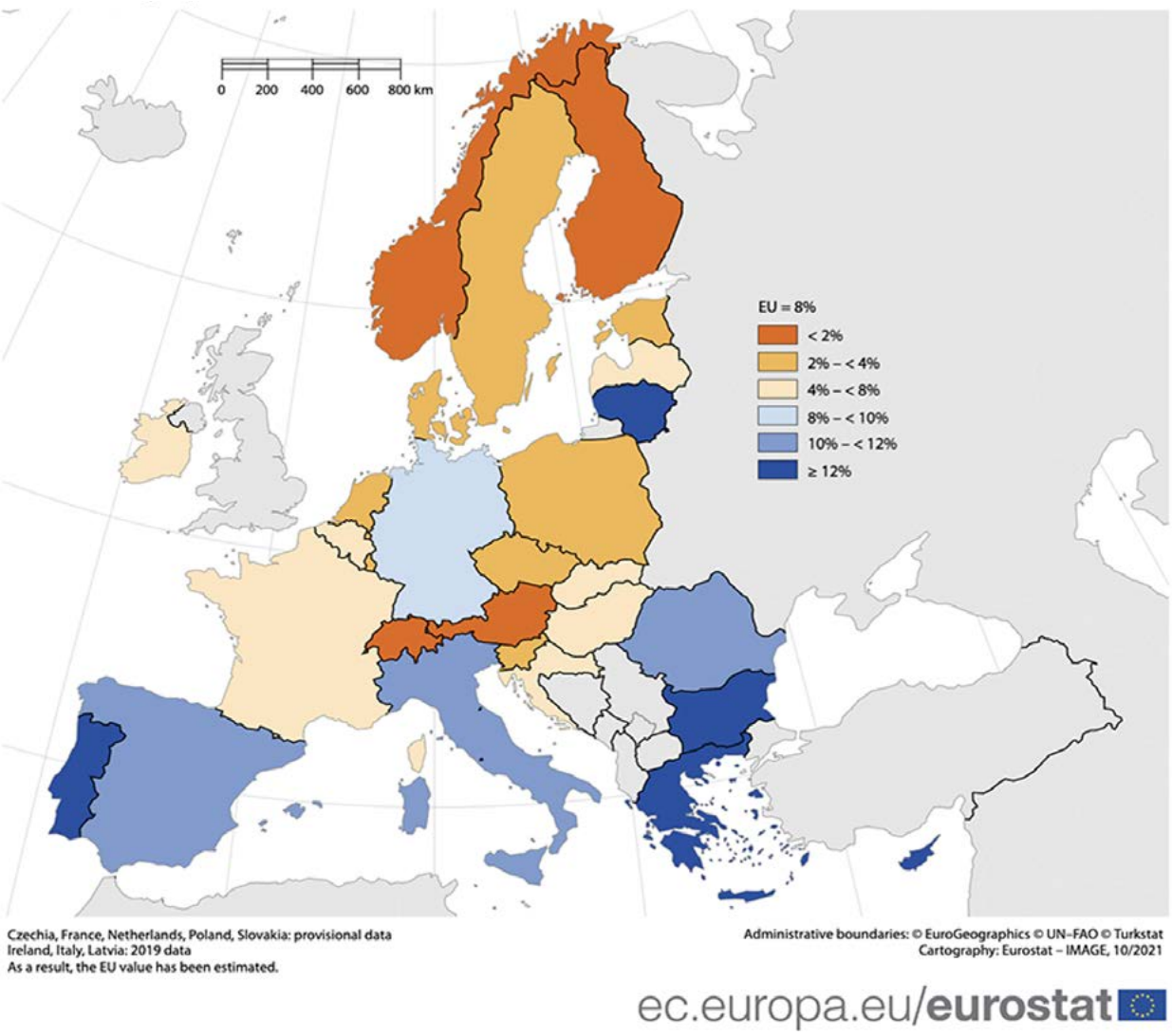
The source of the information is identified in each of the examples below. A list of references is supplied at the conclusion of this report.

A consolidated basis for comparison is the inability of a household to heat its home. The following map, produced by EUROSTAT, shows the extent and disparity of the phenomenon in Europe. The data are included in the European examples.

7 i.e. excessive interpretation of environmental laws as a pretext to refuse housing development. More details are provided later in this chapter, in the example focusing on California

8 Many other initiatives, programmes and measures exist, and a lot have been included in the European Commission's Energy Poverty Advisory Hub's Atlas: https://energy-poverty.ec.europa.eu/discover/epah-atlas_en

FIGURE 1 - INABILITY TO KEEP HOME ADEQUATELY WARM, 2020 (% OF THE POPULATION)



Source: (EUROSTAT, 2021)

WITHOUT SOCIAL SAFEGUARDS, RENOVATIONS DO NOT MEET THE NEEDS OF THE MOST IN NEED - LESSONS FROM POLICIES AND RENOVATION PROJECTS

The examples below illustrate that the lack of proper attention to social risks in public policies and funding programmes can have disastrous consequences, even in countries where the welfare state is known to be generous, such as Sweden. To aid reading, the examples have been grouped into categories: those where policies and programmes are not or not sufficiently targeted and therefore have no impact on energy poverty; lack of social safeguards result in neglecting a part of the population. Last but not least, certain policies explicitly lead to renoviction.

Might makes right: unearmarked policies and programmes can be both discriminatory and costly

The following examples show that unearmarked policies and programmes are discriminatory and costly. The Bulgarian and Italian examples show us that if they are unfiltered or based on a first-come, first-funded basis, unearmarked programmes can lead to delays, inflation and even corruption. On the other hand, funds should be earmarked for social purposes and focus on renovation, not new construction (as detailed for the German case).

- In Bulgaria, the Residential and Multifamily Renovation Programme is a very general system that is mainly used in cities and does not address the most vulnerable households (such as Roma or Turkish minorities) or low-income households living in rural areas. The first-come, first-served selection process can increase inequality and feed corruption.
- In Italy, the Superbonus is a tax credit on 110% of the thermal insulation work's value. Red tape is heavy, and the substantial increase in applications has led to speculation and price increases. This measure de facto excludes a large part of the housing, in particular those with temporary heating solutions.
- In Germany, the most recent version of the BEG programme was launched in January 2021 and implemented as the "energy-efficient building and renovation programme" of KfW (Kreditanstalt für Wiederaufbau, a German development bank). This programme does not consider the different economic capacities of households, and therefore no measures are targeted at the lower income groups. Besides, the amount of money seems insufficient to renovate the housing stock. It serves mostly new constructions.

Unearmarked programme in Bulgaria feed inequalities and corruption

The example in Bulgaria attests that although the need for renovation and the extent of energy poverty is widespread, at least some of the budgets should be directed towards the most marginalised populations. On the contrary, not targeting aid feeds inequalities and has perverse effects such as corruption.

Regarding the number of persons experiencing energy poverty, Bulgaria continues to rank last: according to the most recent data from the EU-SILC (EU Statistics on Income and Living Conditions), 22.2% of the population has unpaid electricity bills, while 27.5% of the population struggles to keep their house warm enough. In addition, also in 2020, the Bulgarian National Statistical Institute reported that 1.66 million Bulgarians (23.8%) live below the poverty line of BGN 451.00 (€230.60) per month; of this group, only about 250,000 receive heating subsidies.

Despite or because of those figures, Bulgaria does not target the efficient renovation of the housing of low-income households. On the contrary, the Residential and Multifamily Renovation Programme subsidises 100% of the energy renovation of all buildings without fine selection. This unearmarked subsidy system is very costly and has developed significantly in urban centres and is based on a first-come, first-served basis, which feeds the risks of corruption. In practice, the market value of the few buildings that have been renovated has increased significantly.

The first version of the programme offered 75% EU funding and 25% co-financing from the owners, but demand for the programme was deficient. Similar changes are also planned for the upcoming Resilience and Recovery Plan, but these have not yet been approved. Currently, the subsidy is intended to be reduced to 80% in 2025 and 60% in 2028.

Non-governmental organisations such as the NGO EnEffect have sought to draw attention to the needs of the most vulnerable such as the Roma and Turkish minorities, many of them living in rural single-family housing, but so far without concrete results.

Sources: (Bogdanov and Zahariev, 2022; Bouzarovski et al., 2020; Cornelis et al., 2018; EUROSTAT, 2021; Szemző, 2022)

Big public spending, low social and environmental impact in Italy

This example in Italy proves that without clear environmental and social objectives, as well as specific support, a generalist approach, although generous, does not benefit low-income households and does not allow for real energy gains. On the contrary, the multiplication of projects financed entirely by public money and therefore the absence of accountability on the part of the project owner side generates delays, speculation, and inflation.

Italy officially has more than 2.3 million people living in energy poverty, and 11.1% of the population cannot keep their homes adequately warm, according to SILC data. At the same time, 50.9% of households, i.e. 13.2 million people, consider their income barely sufficient to meet basic needs. Of the 12 million buildings for residential use, 60% are over 45 years old. The country has chosen an extraordinarily generous but totally unearmarked renovation policy, the 110% Superbonus. In 2021, the first year of effective application of the Superbonus, there were 40,029 certified interventions, including 5,218 condominiums, 20,548 single-family buildings and 14,263 independent dwellings. 38.4 billion euros were invested between 2020 and 2021 for energy upgrades. Interventions have increased significantly (+514%) but without targeting buildings with vulnerable households or social housing.

In practice, the 110% Bonus, a time-limited measure, corresponds to a tax credit on 110% of the thermal insulation work's value. However, it is still subject to technical and energy performance thresholds (+2 energy classes). The bureaucratic, administrative, and financial part is heavy, and the substantial increase in applications has led to speculation about the renovation, driven by the rise in the price of labour and raw materials.

In fact, in its work on social housing, the environmental association Legambiente has demonstrated that this measure excludes a large part of the housing in the south of the country, which does not have fixed heating solutions and relies on potentially dangerous temporary solutions (Legambiente, 2022). The bonus explicitly disincentivises the most efficient and sustainable interventions by making them more complicated, encouraging one-off interventions and the installation of gas boilers. The bonus does not provide for specific access to subsidised credit, which strongly limits the possibility for families to benefit directly from it. Finally, the aspect of urban regeneration is excluded from the general reflection of this policy and overall discussions on renoviction.

Source: (ENEA, 2021; EUROSTAT, 2021; Gerosa and Pizzorno, 2022; Legambiente, 2022)

Renoviction stemming from unearmarked energy performance policies in Germany

This example in Germany illustrates that unearmarked energy performance policies do not serve the energy renovation of buildings where the most vulnerable people live and may instead lead to rent increases. Specific budget lines should be designed for the homes where low-income people live.

Most of the German housing stock dates from the second half of the twentieth century (after the Second World War), which makes it most recent than in many other EU countries. Despite this, 95% of the building stock was built before 2012 and is in need for energy-proof renovations. The relatively young building stock could perhaps make it easier to perform certain work (such as insulation) to comply with the EU's climate neutrality target, but as elsewhere in Europe, the stakes are high. According to the GdW, Germany's largest association of real estate companies, the energy consumption of housing is stagnating, fuelled by the rebound effect and the increase in living space.

The main instrument is the Federal Financing Programme for Efficient Buildings (Bundesförderung für effiziente Gebäude – BEG) is financed through the Climate and Transformation Fund (Energie-und Klimafonds – KTF), introduced in 2011 and financed by the revenues of the EU ETS, the national CO2 fee and the federal budget. The BEG programme was launched in January 2021 and implemented as the "energy-efficient building and renovation programme" of KfW (Kreditanstalt für Wiederaufbau, a German development bank). It consists of three sub-programmes: one for residential buildings, one for non-residential buildings, and one for individual measures (small renovation projects). In 2017, a previous renovation programme allocated financial support to modernise 275,000 dwellings.

The BEG programme has two main problems: it does not consider the different economic capacities of households, and therefore no measures are targeted at the lower income groups. Besides, the amount of money seems insufficient to renovate the housing stock. Instead, it is mainly used for new construction. Indeed, although BEG funding has tripled between 2020 and 2021, one report highlights a 15-fold increase in subsidies for new construction between 2019 and 2021 and only a 6-fold increase for complete renovations. In a webinar hosted by FEANTSA in March 2022, Anna Wolff, Policy Advisor on Energy and Climate at Deutsche Umwelthilfe e.V. "The inefficiency of this distribution becomes even clearer if we consider that new constructions represent less than 5% of the building stock since 2012, but that almost 60% of subsidies have gone to new constructions".

However, the right to a "modernisation levy" has so far allowed landlords to increase rents by up to 8% to compensate for the costs of renovations. Renovations have led to increase inequality through higher rents and lead renovations.

For Anna Wolff, solutions exist to improve funding allocation to make the fund more socially just. The state should allocate a structural amount of 25 billion per year and focus on renovating the existing building stock to climate-friendly standards. That would help mitigate rent increases and support residents of low-efficiency buildings who are particularly exposed to high energy prices. Another proposed solution is a bonus for low-income private landlords, alongside the introduction of minimum energy performance standards.

Source : (Boutelet, 2020; EUROSTAT, 2021; FEANTSA, 2022a; Fondation Abbé Pierre-FEANTSA et al., 2022)

The case for social safeguards

The following examples demonstrate the importance of social safeguards at all levels. The case of Estonia demonstrates the importance of policies and programmes that are sensitive to the diversity of social and economic experiences in apartment buildings (Estonia). This is also true for energy service companies (ESCOs), who must design their services to remain affordable for low-income households (Latvia).

When there are guarantees, it is important to remember that the most vulnerable people may not be eligible for renovation programmes because they do not necessarily fit into the right categories of beneficiaries (Slovakia) or have all the documents proving their situation (Croatia).

Finally, municipalities must be assisted in maintaining and improving their housing stock, so it remains affordable and benefit vulnerable communities (Hungary and Poland). The Greek experience demonstrates that policies should aim to improve the situation of rental markets, even if they only make up a small portion of the housing stock or are not perceived as the norm.

- Tallinn, in Estonia, offers a loan interest subsidy for renovating private apartment buildings. This is mainly used by the wealthiest and for larger-scale investments. low-income households living in apartment buildings may be unwillingly dragged into massive renovation works, heightening their own financial pressure and the risk of social exclusion.
- In Latvia, residents benefitting from renovation via an ESCO contract programme have to pay 15% higher energy bills, which becomes de facto inaccessible for low-income households.
- In Slovakia, the law requires condominiums to create an "operation, maintenance and repair fund" to ensure that investments in the refurbishment are planned for the long term and do not significantly affect the household budget; and that condominiums have their own resources. However, so far actions toward low-income condominium and single-family houses, mostly in rural areas, was limited.
- In Croatia, Homeowners that recipients of specific social benefits are the main recipients of renovation policies. Social welfare and energy audit companies are involved from the beginning to ensure smooth processes. However, the most vulnerable might not be eligible since they may not have all the paperwork justifying their ownership situation.
- In Poland, the major shake-up of its social housing system has led to the relocation of the most precarious to the outskirts of the city while new tenants move in. Some residents are no longer able to afford to pay their rent after the renovation.
- In Hungary, the most vulnerable fractions of the population, such as the Roma, are often labelled as 'non-payers', so municipalities exclude them de facto from social/municipal housing and energy-efficient projects, with no alternative. Furthermore, when municipalities struggle to improve their housing stock, they might be tempted to sell them – leading massive evictions, moving out a significant proportion of the previous inhabitants to other unfit housing, often of more peripheral locations (from cities to the least developed villages).
- In Greece, renting is perceived as a temporary situation and improving the situation for the rental markets is overlooked. Ambitious policies on energy poverty and zero emission housing are only now considering comprehensive actions on buildings (not only individual flats) but neglect the specific needs and interests related to rental properties and the risks of price increases following renovation.

In Tallinn, Estonia, low-income homeowners can be evicted by the condominium when they cannot afford renovations

This example in Estonia shows that low-income homeowners also risk eviction if they are unable to support the costs of renovating the building in which they live. Guarantees are needed at the co-ownership and condominium management levels.

75 % of Estonians live in apartment blocks, many over 50 years old. About 2.7% of the Estonian population is not able to heat properly, according to EU-SILC.

The country has two state-funded renovation programmes (via KredEx, a public financing institution), with a marginal level of unearmarked subsidy (10%) and technical backing that covers 50% of the costs of a technical inspection, thus reducing bureaucratic expenses. Local municipalities can provide additional support.

Tallinn offers a loan interest subsidy for renovating private flat associations (HHMA). This measure is mainly used by the wealthiest and for larger-scale investments, which de facto excludes the most vulnerable people. This is because a simple majority of HHMAs co-owners decide on renovations and loans for renovations. Thus, in blocks where the wealthiest households are the majority, renovation can start without the agreement of low-income households. They might therefore be forced to sell their flats and move out, renovation here fostering housing exclusion. In addition, housing associations have the legal right to demand the eviction of owner-occupiers who cannot pay their share of housing costs, including renovation costs.

Sources: (EUROSTAT, 2021; Szemző, 2022)

Higher bills during the ESCO contract in Latvia

This example in Latvia identifies that ESCO-type contracts can increase charges and thus make them unaffordable for low-income households. ESCOs are often presented as an ideal solution but safeguards must also be introduced since not everyone has the same financial capacity.

6% of the Latvian population is unable to keep their home adequately warm, according to SILC data. Most of the Latvian multifamily buildings were built before 1992. Almost all of them require deep renovation due to low energy efficiency and insufficient maintenance measures over the past decades (deep renovations were defined as improving the energy performance by 50% or more – the European Commission's recommended definition of 60%).

The Latvian Baltic Energy Efficiency Facility (LABEEF – SUNShINE project), started in 2016 and funded by the European Bank for Reconstruction and Development (EBRD) since 2018, uses energy performance contracting (EPC) to modernise the building stock. LABEEF manages deep renovation projects through energy service companies (ESCOs). The renovation is financed from energy savings. However, residents benefitting from the LABEEF programme have to pay 15% higher energy bills during the ESCO contract, which becomes de facto inaccessible for low-income households.

Source: (EUROSTAT, 2021; Funding for Future, n.d.; Turai et al., 2021; Turai and Szemző, 2022)

In Slovakia low-income people's condominiums and individual houses are not renovated

This example in Slovakia confirms that policies must also include more comprehensive geographical scopes and targets to address the specific needs of the dwellings inhabited by the most vulnerable.

5.7% of the Slovak population has difficulties in heating, according to SILC data. Homeownership is the norm: more than 9 out of 10 households own the housing they occupy. In half of the cases, these dwellings are in multifamily buildings, and 85% are built with industrialised technologies. Since the country's independence in 1993, the renovation of residential housing in private hands has been a government priority. Thus, at present, about 70% of all multifamily housings are renovated, which is a remarkable achievement.

Today, building management companies are in charge of co-ownership coordination, annual maintenance, and multifamily housing renovations. The law requires condominiums to create an "operation, maintenance and repair fund" to ensure that investments in the refurbishment are planned for the long term and do not significantly affect the household budget; and that condominiums have their own resources (but from the point of view of the State Housing Development Fund (SHDF), commercial loans are also considered as own resources). These funds come from the owners' contributions, but they are often insufficient to cover the renovation works. For example, in the case of old buildings, even if the owners do not have a meagre income, the fund does not necessarily cover the cost of a major renovation but only basic/urgent maintenance. Moreover, in the case of low-income owners, only a tiny amount can be collected. Condominiums are usually socially mixed rather than homogeneous.

The State Housing Development Fund (SHDF) is a favourable loan scheme that supports condominium financing projects. The fund was established in 1996 as a revolving grant fund and has now been transformed to provide loans at favourable rates. In practice, the fund offers long-term soft loans (up to 100% of the acquisition costs with a maturity of up to 40 years and a differentiated interest rate – 0% to 2%) for various purposes, including the renovation of residential housing. Eligible interventions include, but are not limited to, energy efficiency and insulation measures. The programme is designed to encourage more complex renovations: the more interventions, the lower the interest rate. For SHDF loans for residential insulation, a reduction in heating demand of at least 35% compared to the heating demand calculated before the implementation of the building modifications must be achieved. At the same time, commercial banks also finance renovations, and interest rates are also very low, around 1%. The Ministry of Transport and Construction also provides subsidies for social (public) rental housing, in combination with a SHDF loan, covering 100% of the acquisition costs. These dwellings must meet energy efficiency standards, renewable energy, green roofs, etc.

However, it should be noted that there is no social targeting in the programme, so the most precarious co-owners do not benefit from any additional specific support. As a result, there are fewer renovated buildings in smaller localities, where incomes are generally lower.

In Slovakia, one of the problems in making renovations socially fair is the lack of action toward single-family houses. They are inhabited mainly by elderly people living in small villages with less access to information. More public support should be provided through the Resilience and Recovery Plan adopted in 2021. 528 million EUR will be spent on improving the energy efficiency of 30,000 individual houses. The Slovak Environmental Agency should provide up to 95% of subsidies to socially disadvantaged groups or disabled beneficiaries. This means that the remaining costs would be 5% of the costs. The first call will be published at the end of September 2022.

Sources : (EUROSTAT, 2021 ; Rádio RSI, 2022 ; Szemző, 2022 ; Turai and Szemző, 2022)

Without the right papers, no renovation in Croatia

This example in Croatia explains that despite targeted measures and support for households, administrative burdens can further marginalise low-income households.

Two-thirds of Croatian homes are single-family houses with high energy consumption, built before 1987 without thermal insulation standards. As a result, the latest EU-SILC data showed that almost 8% of Croatian households had difficulties heating their homes.

Croatia has implemented a socially targeted 100% subsidy for energy efficiency works for homeowners, with stringent eligibility criteria limited to recipients of specific social benefits, such as the long-term unemployed and disabled people. The programme is open once a year. According to estimates by experts consulted by FEANTSA, the eligible group covers about 50,000 people, or ~1.25% of Croatia's population (4M). Thanks to these measures, the payback period for households is 5-7 years. The energy savings are, in most cases, higher than the monthly payment rate, contributing to the project's overall affordability.

However, only owners of houses and buildings with clear ownership status can participate. The most vulnerable people are de facto excluded, as they often do not have legal ownership of the buildings or the appropriate papers even if they "technically" live in their "own" home (e.g. they are not tenants). Therefore, to involve the most vulnerable, administrative, legal, and property issues must first be resolved. Furthermore, as the call is only open once a year, all interventions are launched at the same time, which limits the capacity of the construction sector and increases prices.

Social welfare offices are involved in the screening and application process for the subsidy, which allows for the dissemination of information and outreach to those in need. The application process happens offline, which helps to bridge the digital divide. A special mechanism is built into the programme that ensures that energy audit companies provide the audit service free of charge and guarantee that they will also assist their beneficiaries in the application process. These procedures increase the subsidy's accessibility to the less educated and informed individuals while preventing operators from making pointless field visits, preventing them from dealing with families who later turn out to be ineligible.

The government is considering extending the programme to multifamily buildings and apartment blocks It will focus on addressing war damage in particular areas. Policymakers have discussed extending the programme to a broader target group, but the priority is to cover the current group as much as possible. Other users, such as condominiums, can get up to 60% subsidies for an energy renovation and even up to 85% if it is a deep renovation, including a renewable heating system.

Sources: (Bouzarovski et al., 2020; EUROSTAT, 2021; Szemző, 2022; Turai and Szemző, 2022)

In Lódz, Poland, social flats have become unaffordable following renovations

This example in Poland demonstrates that even social housing can become inaccessible if energy renovations lead to a major reorganisation of the properties that does not take into account the needs of the historical inhabitants. This can lead to further social exclusion.

While 3% of the Polish population could not afford heat, it still relies heavily on burning wood and coal. As a result, successive governments have become aware of the need to address energy efficiency and renew the heating infrastructure. For example, the 'Clean Air Priority' programme, led by the Government, should improve energy efficiency, reduce emissions of dust and other pollutants into the atmosphere and reduce energy poverty. In Silesia, an Interreg Europe project (MOLOC) helps household switch to new, cleaner heating systems (such as replacing coal boilers with gas or heat pumps), indirectly addressing energy poverty.

A retrofit envelope of twenty-five billion euros over ten years (from 2020) should be made available to all, particularly the most in need (thanks to local banks and municipal offices). However, in practice, there is a remaining cost: subsidies can cover up to 90% of the total cost of installation for low-income households, but there's still a portion that needs to be financed by the applicant.

In Lódz, the country's third largest city, which has the highest share of municipal housing (11.7%) among the five largest cities in Poland, almost half are in deplorable condition and need repair. Only 2,300 municipal flats (out of 22,729 occupied flats) are rented at a social rate, and there is a huge waiting list for public rental housing.

The municipality of Lódz has embarked on a large-scale renovation programme of 100 blocks of municipal housing in the city centre as part of the EU-supported "Mia100 Kamienic" programme. As a result of the renovations and restructuring, many social rental flats have been consolidated to create larger, and therefore more expensive, units. This policy favouring larger units is discriminatory: these units are rented at higher operating costs, which the former tenants can no longer afford. As a result, the most precarious social tenants, such as single persons, have been relocated to the outskirts of the city while new tenants have moved in. In addition, the rent is set centrally in the town, depending on the comfort level of the flats, so some citizens can no longer afford to pay the rent after the renovation.

Sources: (Bouzarovski et al., 2020; EUROSTAT, 2021; Karver et al., 2022; MOLOC - Morphologies Low Carbon, 2020; Riley, 2019; Rosenow and Cowart, 2020; Szemző, 2022; Turai and Szemző, 2022)

Prejudice, underinvestment, and privatisation of the municipal stock in Hungary

This example in Hungary shows that prejudice against minorities lead to systemic housing discrimination. Besides, privatisation and chronic underinvestment in the municipal housing stock creates more uncertainty for low-income households.

Among the 4.4 million dwellings existing in Hungary, only 3.85 million are inhabited. Despite this, the number of social housings is meagre (the municipalities own 1.3% of the stock), while the large majority of the population (up to 90%) own the home they live in. There are no consistent national social, housing and energy programmes on which municipalities and NGOs could rely and which would allow for systematic and long-term support to vulnerable groups and substandard housing. More than 100,000 dwellings are not equipped with running water, toilets, or bathrooms, and there are more than half a million adobe houses – the fourth of them without foundations. Those dwellings are typically located in deprived or segregated areas of cities and villages.

Besides, 20% of the homes are not connected to gas or district heating systems, are rely on solid fuels for heating. Among them, around 200,000 low-income households receive support for their heating cost in the form of firewood or even coal, while NGOs argue that many more should receive support. Low-income households can only afford low-quality firewood, which has considerable adverse effects on the households' health. Hence, air pollution is highest in smaller villages of the least developed regions of Northern Hungary.

Hungary has been regulating its electricity, gas and heat prices since 2013-2014, at a level corresponding to 75% of 2012 levels. Research[9] has shown the limited impact on vulnerable households. In addition, the energy price crisis is forcing the state to rethink its policy and as a result, the most energy-intensive households will no longer benefit from these regulated prices. Moreover, solid fuel heaters, on which many low-income households depend, are more affected by the current energy crisis, as the prices have not been fixed.

At least 10% of the population is affected by energy poverty – but those figures might be underestimated. Existing measures include social subsidies for vulnerable consumers, social heating fuel subsidies for settlements under 5,000 inhabitants, a solar panel programme, "catching up" municipalities – 300 poorest settlements (RRF), and an energy efficiency obligation scheme. Unearmarked policies include a cap on the prices of gas, electricity, and district heating fixed at 75% of 2012 levels. Housing-related subsidies are oriented towards owner-occupiers and primarily target families with children. New housing is prioritised over housing renovation, even for multi-unit buildings. The energy-efficient renewal of the housing stock has not been a priority of the government in power since 2010. Therefore, the most vulnerable fractions of the population, such as the Roma, tend to remain excluded from the most relevant energy-efficient projects, with no alternative presented to them. They are often labelled as 'non-payers', so municipalities exclude them de facto from social/municipal housing.

Furthermore, as municipalities do not get any funding to improve their housing stock, studies suggest that they might be tempted to sell them – leading to further shrinkage and massive evictions, moving out a significant proportion of the previous inhabitants to other unfit housing, often of more peripheral locations (from cities to the least developed villages). In Salgótarján, a mid-sized town of 34,000 people, between 2010 and 2021, the municipal housing stock decreased by 25% (around 300 units). In 2021, there were 860 units in municipal ownership out of which only 590 were inhabited, 91 units were vacant, and 179 units were designated to be demolished. >>

9 Such as Weiner, C., Szép, T., 2022. The Hungarian utility cost reduction programme: An impact assessment. Energy Strategy Reviews 40, 100817. https://doi.org/10.1016/J.ESR.2022.100817

When projects come up, residents and local populations are rarely consulted. In a project in the Józsefváros district of Budapest, interventions took place in two historical buildings consisting of 23 and 26 units. These interventions resulted in one energy class improvement. Still, they looked more like extraordinary maintenance than energy-efficient renovation – painting facades, repair of the roof and drains, changing windows and working in common areas. At the same time, the interiors of the flats were not renovated, to the great displeasure of the residents, and for example, sanitary facilities were not installed. In addition, no information was provided on the ventilation needs created by the new triple-glazed windows, which led to widespread mould problems.

Sources : (Euronews, 2022; EUROSTAT, 2021; FEANTSA, 2022b; Somogyi, 2022; Weiner and Szép, 2022)

Overlooked tenants in Greece

This example in Greece illustrates the negligence of the public authorities towards the rental market and the specific needs of the people occupying it.

EU-SILC data for 2020 shows that about 20% of the Greek population could not keep their home adequately warm, while previous data shows that 30% of the people were at risk of social exclusion or poverty. Besides, a study conducted in 2022 showed that more than a third of the interviewed households felt too hot in their homes during the summer (34%) and too cold in the wintertime (35%). The housing issue, whether in terms of availability, affordability, or energy efficiency, is highly problematic. Indeed, Greece has almost no social housing. Home ownership is the norm and renting is seen as a transitional situation, although in fact, a fourth of the population are long-time renters. Most residential buildings date from before the 1990s and the first building standards and have low energy efficiency performance.

The first programme, 'Energy Savings at Home', started in 2011 and provided financial incentives to energy-poor and low-income households. It aimed at replacing the window frames and installing shading systems, installing thermal insulation in the building envelope, including the flat roof and 'pilotis' and upgrading the heating and hot water system. However, as 45% of the housing units at the national level are flats in multifamily housings, experts deem critical to accelerate the rate of structural renovation. Ambitious policies on energy poverty and zero emission housing are only now considering comprehensive actions on buildings (not only individual flats) but neglect the specific needs and interests related to rental properties and the risks of price increases following renovation.

The Recovery and Resilience Fund will fund the new phase of the programme. It aims now at reducing primary energy costs by 30% per household and their energy upscaling by three grades. It should cover 105,000 homes by 2025 (knowing there had been only 227,295 beneficiaries from 2011 to 2022). The fund is aimed to provide investments of up to 3.1 billion EUR for the energy upscaling of residential buildings in Greece, with a 1.6 billion EUR share to be provided through subsidies until 2025.

The programme finances work through subsidies and low-interest loans of between 40% (high income) and 75% (low-income households). Interestingly, it also covers interest rates and the costs of energy inspection. However, this leaves a very high out-of-pocket expense, and de facto excludes many households. Furthermore, there are no measures to protect tenants from future rent increases in case of work.

Sources : (Chatzikonstantinou et al., 2022 ; EUROSTAT, 2021 ; Ozgunes and Vrantsis, 2022)

When privatisation rhymes with renoviction

The examples below, taken from Ireland, Sweden and France, show that regulatory safeguards are often not sufficient to prevent the predatory practices of some investors and landlords, focused solely on the profitability of their renovation investments.

- The financialisation of the housing sector and the practices of cuckoo funds in Ireland; and poor enforcement of rent control policies in pressured areas are leading to social exclusion. Homelessness has in fact increased significantly this year.
- In Sweden, many landlords make unnecessary renovations to increase rents. Between 2013 and 2020, the energy renovation of 400,000 multifamily dwellings in marginalised neighbourhoods has been accompanied by high rent increases.
- In France, since 2017, the law has protected tenants against uncontrolled rent increases, but predatory businesses have found loopholes. It makes renovictions hard to address. For instance, in Paris, a construction company has not formally evicting tenants but coercing them to leave to perform renovation works.

"Cuckoo funds" take advantage of their dominant position in Ireland

This example in Ireland shows the perverse effects of the Build-to-Rent model carried by cuckoo funds which only aims at the profitability of their rental investment and generates exclusion.

Just under 5% of the Irish population has difficulty heating their homes. Still, more recent data shows that 29% of the Irish people are estimated to be in fuel poverty, particularly since the drastic increase in prices and inflation.

In terms of renoviction, two examples are visible in Ireland. The first is the financialisation of the property stock: 'cuckoo funds' (vulture funds) bought up properties en masse, including large portfolios of distressed property assets, when prices collapsed in the country after the 2009 economic crisis. These global institutional landlords are also forward buying and developing new multi-unit rental housing built for this purpose (Build-to-Rent). In the absence of rent regulation or rent cap policies, they are now taking advantage of a dominant position and are renting out or reselling flats at a disproportionate price. This practice is strongly condemned by tenants' organisations.

However, there are limits to rent increases in high-pressure areas, but these provisions do not seem to be applied. This leads to renovictions, as landlords seek to accommodate new tenants at higher rents by using renovations to evict existing tenants. It is important to note that Ireland is currently facing an unprecedented increase in homelessness (+30% August 2021 to August 2022, including over 3,200 homeless children).

Sources; (ESRI, 2022; Fondation Abbé Pierre-FEANTSA et al., 2022; Lima et al., 2022; Simon Community, 2022)

In Sweden, renoviction challenges the universal dimension of the social democratic welfare state

This example in Sweden reveals that renovations can be disguised as an excuse to increase rents. One of the solutions is the development of models that take better account of the habits and needs of the inhabitants, including tenants.

Sweden is known for its generous welfare state, and wide availability of rental housing (more than 3 of 10 million Swedes live in rental housing, among which half live in municipally owned rental housing) and strong tenants' rights. However, up to 2.7% of the households were unable to keep their home adequately warm. Besides, substantial deregulation since the 1990s has led to the marginalisation of formal rental housing.

A Swedish legal framework regulates the relationship between tenants and landlords. For example, rents are negotiated collectively and cannot be increased without good reason. However, in the case of renovation, the legal interpretation is biased in favour of landlords. Renovations become a pretext for increasing rents considerably. Swedish tenants, therefore, oppose these renovation plans of the Swedish housing companies in different ways (delaying the processes, disengagement policy, demand for liability, etc.). Research has confirmed that many landlords make unnecessary renovations to increase rents.

Indeed, researchers Åse Richard and Dominika V. Polanska (Södertörn University and Uppsala University), showed at a FEANTSA event that between 2013 and 2020, the energy renovation of 400,000 multifamily dwellings in marginalised neighbourhoods has been accompanied by high rent increases, mental and physical illness, forced removals, neighbourhood disturbances, segregation and housing inequality. Combined with decades of lack of maintenance of the housing stock, where tenants had only a symbolic influence, these renovations have been unnecessarily extensive ('over renovations').

In contrast, in cooperatives, where residents have formal influence, renovations lead to careful, small-scale structural renovations that are less costly and more energy efficient.

They therefore conclude that if renovations are a necessary element of a building's lifespan, they should always be carried out with the tenants' consent. To promote understanding in research, civic society, and politics, the researchers advise forging allies and politicising the remodelling issue. They include enacting rent caps, increasing public assistance, reinforcing tenants' rights in the law, advocating progressive housing policies based on evidence, and emphasising best practises in order to control profit.

Sources: (EUROSTAT, 2021; FEANTSA, 2022c; Fondation Abbé Pierre-FEANTSA et al., 2022; Sveriges Allmännytta, n.d.)

In France, the difficulty of enforcing the law against predatory businesses

This situation in France shows that predatory businesses always find loopholes despite political will and laws protecting tenants from uncontrolled rent increases. This exacerbates renovictions.

In France, the Observatoire National de la Précarité Energétique notes that 20% of French people report having suffered from cold during the winter of 2020-2021 for at least 24 hours.

In France, since 2017, the law has protected tenants, but the issue of renovictions remains omitted.[10] In practice, the increase in rent when renewing a lease cannot exceed the variation in the rent reference index (IRL), and in areas where rental demand is high, after the lease is terminated, the same level applies to the new tenant's rent. In these areas, in the case of "upgrading works", the rent increase cannot exceed 15% of the actual cost of the renovations, all taxes included. Evidence from highly populated urban areas, for example, has revealed that the tools are insufficient or not implemented effectively enough.

For instance, the construction company Cherpantier buys run-down structures in Paris, does not renew tenant's leases (or harass them until they leave) and minimally renovates the flats before reselling them for astronomical sums. Even if tenants are not formally evicted and many have received compensation, numerous former renters have complained of coercion by the company.

Local policies and initiatives are proving that it is possible to reconcile social and environmental objectives.

The following examples show that renoviction is not inevitable. On the contrary, local policies well structured around the needs of the inhabitants seem to be beneficial for social integration. They are often very local experiences, embedded in a very specific community, economic or financial fabric, which could make them anecdotal. However, they draw their universality and their capacity for replication from being able to expand thanks to the very clear identification of needs (France), often where public policies are failing (Hungary, Slovakia). They also show a willingness to learn and improve in pursuit of greater impact (Austria, Czech Republic). Those examples underline the importance of collective responses over and above individual interests (Spain, Italy).

- In Italy, a social ESCO focuses on collective housing (such as shelters and community centres) so that they spend less on utility and more on social integration.
- In Madrid, following the recurrent falling of building parts, neighbours teamed up to raise the alarm about the urgent need for renovation. With the help of the city council, 90 buildings have been renovated, reducing the energy vulnerability of the whole community.
- Renovations are anchored in the Vienna's local economic and social fabric and a unique vision of housing as a public good. Decision-making aims to be inclusive and democratic.
- The Green Savings programme was so far based on ex-post financing, a critical barrier for low-income households. The Czech government is now adding social safeguards, such as financial assistance of up to 80-90% of eligible costs for energy renovation of social apartment buildings (where there is a guarantee that the flats will have social flat status for at least 10 years), and a loan for a low-income household.

10 Decree No. 2017-839 of 5 May 2017

- In Hungary, a programme focuses on adobe houses and villages at risk of abandonment, enabling young families to access decent housing for the first time.
- In Slovakia new, stricter requirements on the energy efficiency of new buildings made construction much more expensive and beneficiaries constrained to live in much smaller homes. But advocacy work enabled the exemption of tiny houses built by the inhabitants of informal settlements in Roma camps from the regulations.
- The Réseau Éco-Habitat provides tailor-made renovation works to energy-poor homeowners. The social dimension is ensured by a dedicated support from a Caritas volunteer throughout the process. This helps overcome the main challenge: convincing families to commit to the work - and, therefore, to leave their homes for a few months.

In Italy, a social ESCO for care facilities

This example in Italy reminds that the social dimension is not (only) provided by individual housing but also by shelters and collective structures. These tend to be forgotten, whereas efficient renovations of these buildings have a potentially huge impact on low-income households people.

A social sector organisation, Fratello Sole[11], has gone against these measures and become the first social Energy Service Company in the country and perhaps in Europe. The idea is to restructure buildings related to the care of the public (such as shelters for young immigrants or women fleeing domestic violence) so that these facilities can spend less on utilities and more on social integration. Redevelopment/ energy retrofit intervention is planned on 350 properties, and 18,6 million euros have been invested between 2018 and 2021.

Source: (ENEA, 2021; EUROSTAT, 2021; Gerosa and Pizzorno, 2022; Legambiente, 2022)

A community-led neighbourhood renovation in Madrid

This example in Madrid, Spain, displays the importance of social cohesion in designing renovation programmes that benefit the whole community.

According to the Ministry for the Ecological Transition and the Demographic Challenge, in 2019, 7.6% of the population could not keep their home at an adequate temperature during the winter, and 16.7% of households had a "disproportionate energy expenditure" (the percentage of expenditure over their income is more than double the national median). Inefficient housing represents a considerable challenge: more than half of the 25 million dwellings was built before 1980 and energy standards.

Like many popular neighbourhoods throughout Spain, Orcasitas was built without the slightest thermal insulation in a deprived area in the South of Madrid. Following the recurrent falling of building parts, neighbours teamed up to raise the alarm about the urgent need for renovation. They lobbied the city council for support for energy renovation and managed to get works undertaken to eliminate parapets and asbestos and install thermal insulation, have achieved a 58% reduction in CO2 emissions and improved the energy scale of buildings from E to C. They have renovated 90 buildings, reducing the energy vulnerability of the whole community. The entire area, mainly composed of low-income owners, will eventually benefit from these interventions.

Sources: (Barella et al., 2021; Obras Urbanas, 2021; Prudencio, 2021)

11 http://www.fratellosole.org/

Social housing, "Gentle urban renewal", and participatory processes in Vienna, Austria

This example in Vienna, Austria, explains the impact of a highly integrated municipal affordable housing policy and the willingness of local authorities to go further in their social inclusion efforts.

The housing issue in Vienna is unique: today, half of the population lives in subsidised housing - either in one of the 220,000 municipal dwellings or in one of the 200,000 cooperative apartments built with municipal subsidies. Vienna's 1,800 municipal housing estates alone are home to almost half a million citizens. In the early 1970s, around 300,000 housing units were classified as "substandard flats", i.e. units without running water and/or toilets. As a result, the municipality embarked on a "Gentle urban renewal" process as early as 1974.

This "gentle" approach means that the different departments of the municipality are proactive in informing and exchanging information with the residents while stimulating dialogue between the stakeholders. Various projects specifically focus on thermal renovation, such as "THEWOSAN". It aims to reduce heating and energy costs for tenants utilizing optimised insulation and state-of-the-art heating and/or cooling technologies, and eco-friendly materials.

The political consensus is strong - all parties agree on the benefits of such a model. Besides, Wiener Wohnen, the city-owned company, Europe's largest municipal property management service, that manages the city's communal apartments and public spaces, has set up services focused on social affairs and understanding how the situation could be further improved. In an interview with Cooperative City, Julia Girardi-Hoog, head of Wiener Wohnen's Department for Social Affairs and Service, explains that there are still many challenges to overcome. For example, even if those housings are open for middle-income and low-income people, undocumented migrants or those who have not had a fixed Viennese address for less than two years will not be able to access them. Another problem is the ageing of the population, which requires housing adaptation on the one hand. On the other hand, it is often accompanied by social exclusion, which must be overcome. Furthermore, immigrants and families with young children tend to participate less in collective decision-making processes. This shows that experiences must continuously aim to improve to broaden their impact.

Sources: Sandra Matzinger, (City of Vienna, 2022, n.d.; Cooperative City, 2022; EUROSTAT, 2021)

Adding safeguards in Czech Republic

This example in Czech Republic confirms the importance of periodic evaluation of national policies in order to adjust and better respond to the needs of the most vulnerable.

The Czech Republic officially has a limited number of households that cannot adequately heat their homes - just over 2%, according to SILC data for 2021.

The "Green Savings" programme, a new version that started in 2021, aims to generally increase the energy efficiency standards of buildings in the Czech Republic (the first version began in 2009 and the second in 2014). The programme provides a subsidy of 30-50% depending on the level of energy savings and can be combined with an allowance for boiler replacement for low-income households. The programme includes support for DIY ("Do It Yourself") measures, which seem an important way to empower communities and reduce renovation costs. However, the programme is based on ex-post funding, a crucial barrier to the use of the programme by low-income households unable to provide upfront costs.

The Czech government is currently seeking to make the programme more accessible to low-income households, as the second phase of the programme (2014 - 2021) did not contain any specific measures for this target group. There are a number of new initiatives being developed to combat energy poverty, including a bonus of up to €3,030 for a low-income household applying for financial assistance for the energy renovation of a family home and financial assistance of up to 80-90% of eligible costs for the energy renovation of apartment buildings with social flats (where there is a guarantee that these flats will have the status of a social flat for at least 10 years), and a loan for a low-income household that has applied for a grant from the programme to pre-finance the energy renovation.

Sources: (EUROSTAT, 2021; FEANTSA, 2022a; Turai and Szemző, 2022)

Investing in villages to enable young families to access decent housing for the first time in Hungary

This example in Hungary clarifies the importance of NGOs and pilot programmes in meeting the housing needs of a part of the population.

In Hungary, a local programme called "Catching-up localities" (Felzárkozó települések, FETE), managed by the Social Inclusion State Secretary of the Ministry of Interior Affairs, run by the Maltese Charity Organisation and financed by national and EU funds, shows encouraging signs. The programme focuses on adobe houses and villages at risk of abandonment, enabling young families to access decent housing for the first time. Eighty families have had access to funding to buy or upgrade a decent house, to equip it with running water, bathrooms and toilets. It should be noted, however, that while the thermal and electrical aspects are relevant, the priority is not the energy efficiency of the housing.

Another reason why this initiative is relevant is its political significance. Several mayors and local politicians have been advocating for several years the possibility of accessing European funding bypassing central government, which they accuse of favouritism against opposition party-run authorities.

Sources : (FEANTSA, 2022b; Hungary Today, 2022; Somogyi, 2022)

Advocacy work in Slovakia to make the homes fit for their inhabitants

This example in Slovakia illustrates the importance of grassroot advocacy work to enable housing to fit exactly to the needs of the inhabitants.

An interesting phenomenon occurred following the increase in energy efficiency standards in 2016. The Slovak NGO DOM, which supports self-build projects with micro-loans for housing inhabited by Roma residents in Rankovce and Kojatice, found itself in temporary difficulty. The new, stricter requirements on the energy efficiency of new buildings (resulting from the EPBD) made construction much more expensive.

As a result, the amount of money that participants would have been able to raise from their own savings or a micro-loan would have been sufficient only for the construction of much smaller dwellings than initially planned (33 m² instead of the almost 60 m² planned before).

Hence, a consultation between stakeholders resulted in the exemption of tiny houses built by the inhabitants of informal settlements in Roma camps from the regulations. While the outcome is positive, this is a regrettable example demonstrating the risk that higher energy performance standards might only contribute further to housing exclusion and the division of the housing market, if no appropriate funding is dedicated to the implementation of energy performance standards for lowest income groups dwellings.

Sources : (EUROSTAT, 2021 ; Rádio RSI, 2022 ; Szemző, 2022 ; Turai and Szemző, 2022)

France: a dense associative network proves essential for social issues

This example in France shows the importance of NGOs, direct participation and personalised responses to their changing needs, so that the most vulnerable people can be empowered in the renovation of their homes.

On the positive side, the Réseau Éco-Habitat is a civil society organisation located in the north of France that helps homeowners in energy poverty to renovate and adapt their homes. It coordinates the implementation of the work and allows people to access the financial aid schemes offered by the Agence nationale de l'habitat (ANAH) and other public bodies, as well as by private actors (mainly foundations).

The support is fully personalised, and each household benefits from the help of a volunteer from the local Caritas branch. These individuals are essential to building trust between the homeowner and the many public and private actors they will have to engage with. The people supported often hide the dramatic situation in which they find themselves, i.e. unfit housing, sometimes without basic modern comfort. Franck Billeau, the founder of the Réseau, notes, for example, that many houses in the region look the same and that a passable exterior may hide the reality of what it is like to live in.

The main challenge is to convince families to commit to the work - and, therefore, to leave their homes for a few months. They are often so destitute that they find it hard to believe that support is possible and that organisations are prepared to help them obtain funds or even a loan to pay the remaining costs.

Franck Billeau notes that to be truly beneficial, the recipient must be an active participant, and their social reality must be considered (age, disability, literacy level or internet access). The house's specific needs must also be considered, for example, by selecting suitable materials. Until now, public policies have tended to develop a 'windfall effect'. For example, the political choice to favour loft insulation by launching a "1€ insulation" operation directs the whole construction and renovation sector towards the same type of materials, technique, or know-how. It may not necessarily correspond to the households' needs, the housing features, or the local architecture. These ill-adapted measures can cause a lot of technical and trust damage.

Franck Billeau believes that it is critical that when work is undertaken, housing becomes as thermally efficient as possible because there is a significant risk that works done in a disorderly fashion will create long-term problems (dampness and mould, for example) and have no real impact on energy consumption. Instead, every renovation should be respectful of the context in which it takes place, to be truly sustainable socially, economically and environmentally. In fact, the organisation undertakes each stage of the renovation on a case-by-case basis - which de facto limits the number of worksites initiated each year.

Sources : Interview with Franck Billeau, (Fondation Abbé Pierre-FEANTSA, Coupechoux, and Serme-Morin 2022 ; ONPE 2022 ; Réseau Eco Habitat n.d.)

RENOVICTION CHALLENGES IN NORTH AMERICA

Although the examples below can seem anecdotal, as this report focuses on Europe, the lessons to be learned from policies implemented in Canada and California (USA) may be quite relevant in the European context to understand and address renoviction. The Californian example illustrates how some environmental laws can be used by some ill-intentioned parties, thereby undermining the development of affordable housing. The Canadian example shows that it is not enough to have policies to address renoviction: they must also be implemented.

"Greenmailing" in California prevents the construction of new (affordable) housing

This example in California recalls that safeguards are needed at all levels. In California, some environmental rules can be misused to feed NIMBYism and undermine social cohesion.

California, the world's fourth-largest economy, is home to half of all homeless people in the United States. Numerous studies show that at least 10% of these homeless people have full-time jobs. The first victims are the non-white people.

In California, all public and private works, such as the construction of higher-density housing (e.g. multifamily buildings or social housing), are subject to a rigorous impact analysis on noise, air quality and protected natural areas. While such rules may appear essential at first glance to conserve nature, their rigorous application in an environment of gentrification and NIMBYism at its worst effectively halts the construction of dwellings throughout the State.

The California Environmental Quality Act (CEQA) was implemented in the 1970s to protect the land. But today, it creates a de facto form of "green mailing", blackmailing with ecological arguments. "A CEQA suit is now so terrifying to developers-the delays so long. The legal fees so excessive-that the mere threat of one is enough to force a developer to the table", says M. Nolan Gray. As a 'self-executing' act, CEQA is enforced by aggrieved parties who seek that a court order either a full environmental review—in circumstances where none was previously considered necessary—or significant adjustments to an existing permit. These cases can also be filed anonymously.

Housing developers and NGOs anticipate this by submitting thousands of documents and studies, but this is rarely enough. Nothing seems to be working to address this crisis sustainably and to give low-income and middle-class people the means to live in dignity.

Sources: (Dillon and Oreskes, 2019; Gray, 2021; Levin, 2022; Wagner, 2018)

Canada: a framework to avoid renoviction that is rarely enforced

This example in Canada demonstrates that policies to address renoviction may not be effective unless efforts are made to implement them.

Many measures have been introduced in Canada to combat renoviction, but not always with the desired success. For example, renovation permits are conditional on tenants not being evicted in Montreal. In the province of British Columbia in Canada, since February 2019, landlords can be fined up to CAD 1,000 per day if they evict tenants without notice or do not give them the right to move back into their flats at the same level after renovation.

In Nova Scotia, between November 2020 and March 2022, the government introduced a 2% cap on rent increases and a temporary ban on renovictions. This measure seemed urgent as Nova Scotia had been experiencing an increase in homelessness for several years, partly due to a sharp rise in the cost of housing caused by the financialisation of housing. In the Halifax housing market, the vacancy rate is 1% in urban areas, and prices have risen dramatically since 2020 (by about 25-30% per year). During the COVID state of emergency, in November 2020, the Minister issued a directive prohibiting "renovictions" (defined as "a renovation undertaken by a residential landlord on residential premises, or a building containing residential premises, that will require the tenant to vacate the premises") for the duration of the provincial state of emergency.

The ban has since been replaced by a new legislative framework, which is supposed to help tenants. This legislative framework stipulates that there are two proper ways to terminate a tenancy for demolition, repair, or renovation work:

1. Mutual agreement (i.e. both the landlord and the tenant agree to end the tenancy due to renovation),
2. Or order from the Director of Residential Tenancies, an administrative board that handles complaints, disputes, and hearings between landlords and tenants.

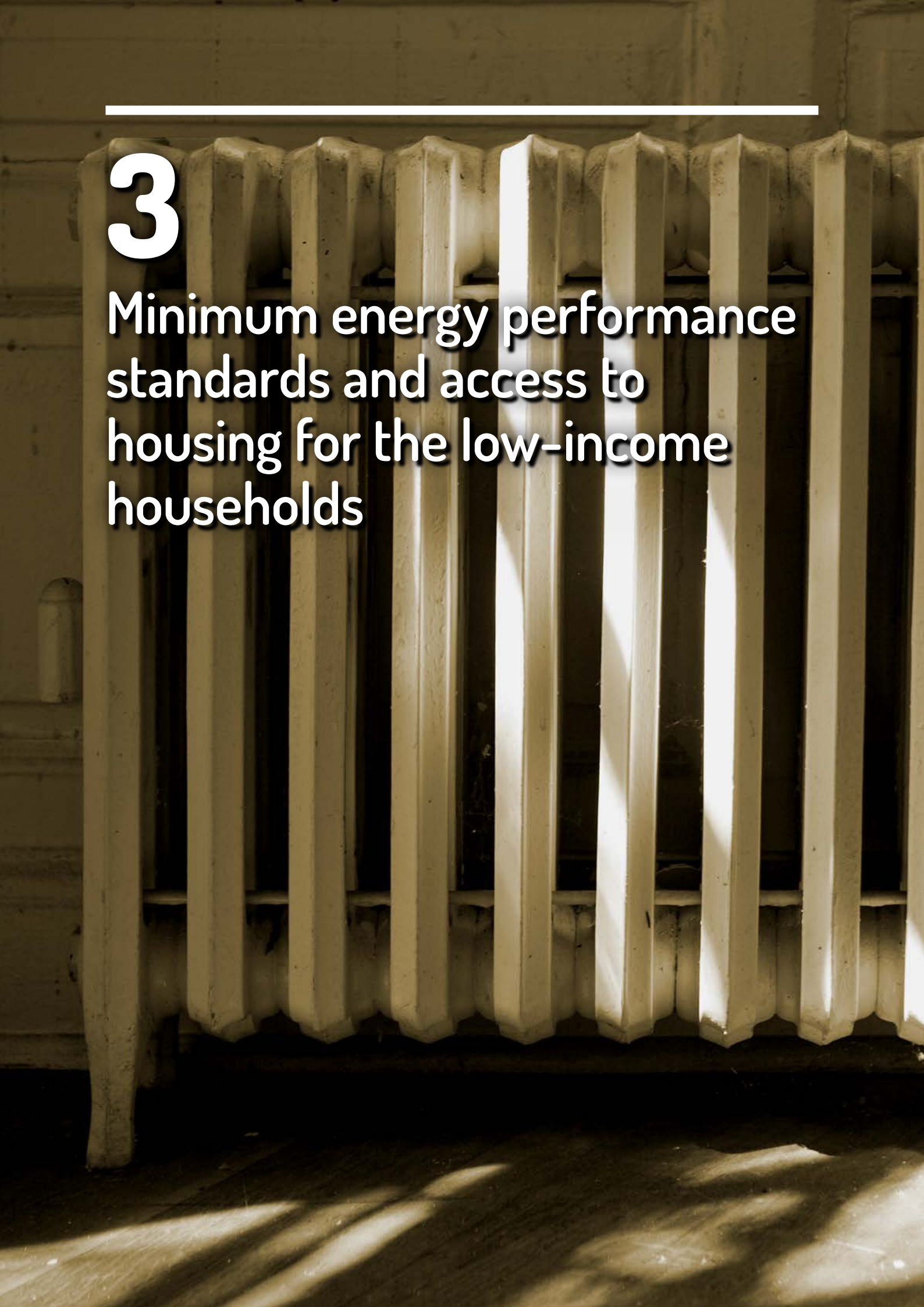
Suppose the landlord and tenant do not agree to end the tenancy. In that situation, the landlord may ask the Director to issue an order ending the tenancy and directing the tenant to depart the property on a particular date. According to the law, the date must occur within the next three months and a maximum of twelve months. The requirement to demolish the residential property or perform significant repairs or renovations that necessitate planning permission and free possession of the residential property justifies the action. To demand control of the residential property, the landlord must be in possession of all required licences and approvals.

If a landlord terminates the tenancy, the tenant is entitled to compensation equal to the rent payable for the last 3 months. The compensation depends on the size of the residential property.

If the tenant continues to reside in the residential premises until the date specified in the agreement or order, they are not required to pay rent to the landlord for the applicable period. If the landlord makes another dwelling available to the tenant and the tenant agrees to join a lease for the new residence with the same benefits and obligations as the current one, the tenant is not entitled to compensation. Unfortunately, this has never happened before.

However, the legislation is rendered useless due to its lack of enforcement. In a meeting with FEANTSA, Canadian Member of Parliament for Dartmouth South and NDP (New Democratic Party) House Leader Claudia Chender explained that the balance of power remains unequal between tenant and landlord, and cases rarely go to court. Landlords pressure tenants to leave, tell them they must leave when they don't, or make their lives so miserable that they end up leaving. The MP reported that after the renovation ban ended, families began being told they were being evicted from multi-unit buildings. All but one of the families left before their hearing, as between that day and their hearing, their housing conditions had deteriorated considerably (heat source cut off, flooding, etc.).

Sources: (FEANTSA, 2022c; Fondation Abbé Pierre-FEANTSA et al., 2022; Stewart McKelvey, 2022)



3

Minimum energy performance standards and access to housing for the low-income households

Minimum Energy Performance Standards (MEPS) or building performance standards (BPS) in the US, are systems that aim to improve building performance, from electricity, gas, or water use to CO2 emissions and peak energy demand. Several existing or planned programmes were examined to assess the social opportunities and risks of minimum energy performance standards (MEPS). These examples reflect the practices under discussion in Europe and illustrate the different impacts and outcomes, both negative and positive. These analyses are not universal as much depends on the national context. The data was gathered through a literature review and direct communication, and the number of examples was also constrained by the amount of information available. Because the level of detail available for the various models presented significantly varied, they are not directly comparable. The report already suggests several key issues and the need for further study and comparing different approaches and solutions to the presented problems.

The source of information is indicated in each example, and references are provided at the end of the report.

WHAT ARE MINIMUM ENERGY PERFORMANCE STANDARDS (MEPS)? MEPS IN THE EUROPEAN CONTEXT

In the context of the European Green Deal, EU Member States must achieve a zero-emission building stock by 2050. They must therefore set specific deadlines for completing higher energy performance classes through new National Building Renovation Plans. They are also empowered to develop national Minimum Energy Performance Standards. Some Member States have already started to take action.

MEPS are part of an overall strategy to target the obstacles to renovation and lower the costs for homeowners and tenants living in the least performing building (usually those in Energy Performance Certificate (EPC) classes G or F), together with building and construction codes. The G class (the worst performing buildings) corresponds to around 15% of the dwellings in Europe. According to the Commission's website, "a home in energy class G consumes about 10 times more energy than a nearly-zero energy building or a zero-emissions building. Upgrading these buildings through renovation to energy class F (around 30 million buildings) will trigger between 4.6-6.2 Mtoe a year in energy savings across the EU. An upgrade to energy class E will trigger about 2/3 more energy savings." (European Commission, 2021b).

MEPS represent an opportunity to direct the renovation toward the most vulnerable and lowest-income households, particularly renters. Research has shown that energy efficiency policies are often poorly targeted and do not account for the profile and needs of vulnerable families in the private rented sector. Thanks to MEPS, the split incentive – also known as the tenant-landlord dilemma - is reversed, with the law obliging landlords to invest in the energy quality of their properties. Given that households in the private rental market struggle with energy-related problems to a much greater degree than the general population in terms of any energy poverty indicator, the potential is enormous (Bouzarovski et al., 2021; Oikonomou et al., 2022).

To make the system work, the Commission also proposes to review the system of energy performance certificates to make them more transparent and reliable. Currently, their reliability is often criticized, and they are not uniform between the Member States, which poses problems of comparability. The proposal for an EPBD includes a template for EPCs with a minimum number of common indicators on energy and greenhouse gas emissions, as well as voluntary ones, such as charging points, indoor air quality and global warming potential, based on the building's life-cycle carbon emissions. Finally, the revision also includes common requirements for the databases and the provision of public access on the energy performance of buildings. This will improve the quality of the information available and facilitate the work of public authorities and financial institutions. Louise Sunderland, an expert at RAP, interviewed in the context of a work performed for FEANTSA, also recommends that they better measure the reliance on fossil fuels for heating. Knowing this could unlock fundamental phase-out strategies.

Issues

The proposed Energy Performance of Building Directive (EPBD) aims to renovate housing classified as G to F by 2030 and E by 2033 (different rules apply to public and non-residential buildings). However, the ambitions are insufficient to improve the quality of buildings significantly. Indeed, as pointed out by expert Javier Tobias (Ecodes), in Spain and in many other countries, changing the windows to double glazing or the boiler to a more recent one could be enough to climb from one class to the next. This is a financially acceptable investment and is also not intrusive, hence not requiring people to leave their homes for the duration of the work. Still, it would not necessarily lead to significant energy gains. Likewise, Etienne Charbit, Energy Efficiency Project Manager at CLER, the French Network for Energy Transition, regrets the lack of a link between energy reduction standards and the definition of efficient or deep renovation (an E class is not "net-zero"). The CLER considers that the ambitions of the European Commission's proposals on minimum energy performance standards are at this stage very insufficient, as they take too long to implement (until 2050). The CLER recommends measures such as the obligation to have an energy performance certificate, more financial support for deep renovation; standards for the entire life cycle of buildings; and strengthening the energy communities' role and means of action. Besides, Etienne Charbit argues that "the timetable for the adoption and revision of ecodesign and energy labelling regulations for appliances should be accelerated, and the ambition of the regulations on heating appliances and water heaters should be increased" (CLER - Réseau pour la transition énergétique, 2022a).

Expert Louise Sunderland also calls for better enforcement and monitoring of the existing rules. She observes that the impact of existing policies is hard to assess, from awareness to compliance, and whether or not this is causing a hardship or unexpected effects.

Financing those works is one of the hot spots. Louise Sunderland underpins the need for high levels of public subsidy, as low-income households have difficulties accessing finances, and the cost of the investment often require households to invest savings, that lowest income groups don't have. In her view, "it's completely inappropriate to ask those households to take on finance."

For FEANTSA, the financing problem goes further. What is needed, to ensure a positive social impact, is ambitious public financing. However, according to a study conducted by the University of Ghent on the financial barriers to renovation in Flanders, about half of all households in the study are just unable to fund the home renovation work needed to meet the 2050 energy performance targets (whether renovations are spread over the years or financed and executed all at once). Worryingly, the study concludes that "additional renovation subsidies or government-sponsored interest-free renovation loans" will not alleviate the problem due to limited public financing capacity and these households' incapacity to repay a new loan, even a 0% one. The study indicates that there is a need to incentivize the 50% of homes that can renovate. (Albrecht and Hamels, 2021). **For FEANTSA, it is imperative that the other 50% will not be left behind and will benefit from public funding to renovate too.**

One of the problems is also about imposing those standards – the idea of regulating people's property might be sensitive. How could individuals be persuaded to undertake the task without making policies appear excessively restrictive? The issues are very different between multifamily housing and individual dwellings. Louise Sunderland reports that many condominiums in Central and Eastern Europe have been successfully renovated using structural funds, leaving single-family homes out in the cold. The reverse is true in the UK, where it is challenging to find common ground between the co-owners. This context partly explains why MEPS only apply to properties placed on the rental market in France and the UK.

The final criticism is that MEPS could aggravate the affordable housing lack of availability for lowest income groups on the private rental sector, and the most vulnerable who do not even access the rental market, as property owners are likely to increase

rents after renovations to recoup their investment, particularly if the upgrade is imposed on them rather than steaming from choice.. .As mentioned through examples in the first part of the report, the risk is in the implementation of MEPS and how to ensure the establishment of these standards will not lead to further housing exclusion though rent increase and gentrification?

Slums, informal housing and squats are a reality for many people discriminated against by gender, ethnicity or migration status The United Nations estimates that one billion people live in such conditions (United Nations, 2019). FEANTSA estimates that it is about 700 000 people who are homeless in Europe on any given night, while housing prices in the European Union for both renting and buying have been increasing since 2010 (according to Eurostat, from 2010 to 2021, average rent prices have gone up by 16%, while house prices have gone up by 42%). In Europe, the largest shanty-town is the Cañada Real on the outskirts of Madrid, home to almost 8,000 people, a third of whom are children (la Informacion, 2021). The Cañada Real made the headlines in Spain in 2020 when the supplier rushed to cut off all electricity and heating supplies without giving the population any means of redress (el PAÍS, 2021).

As we will also see in the national cases, highlighting how to respond to the above-mentioned challenges, one of the critical points that the Renovation Wave strategy recognises is that these standards should be part of a comprehensive framework that includes increased practical support for building owners and occupiers and adequate and appropriate funding (subsidies, grants, zero-interest loans), and not be an isolated policy. There must be social safeguards that protect the affordability of housing and its availability and ensure that minimum standards are manageable for all. Funding at the local level for programmes to enable and verify compliance is crucial to ensure that the bar brings to effective renovations (Sunderland and Santini, 2021). It is also critical to allocate resources to engage and train all those involved in renovation locally, to be as close as possible to households, to carry out correct diagnoses and to ensure effective and competent support for the work.

COUNTRY EXAMPLES AND LESSONS LEARNED

Only a handful of European countries (EU and non-EU) have implemented or are on their way to implementing Minimum Energy Performance Standards: Belgium (Flanders and Brussels), France, the Netherlands, and the UK. They exist in 9 areas of the United States (at the local or state level) (IMT, n.d.). However, the measures' scope and impact might differ widely, and they are often not at the same stage of implementation. Besides, the level of detail available for the different examples presented varied greatly, and as such, they are not directly comparable. When possible, challenges and lessons to be learnt have been indicated. The stalemate of current initiatives may be attributed to Member States' expectations of coordinated European action.

- In France, energy performance standards only concern properties on the rental market (from 2023) and many NGOs denounce a low level of ambition.
- In the UK, MEPS have been existing since 2015 but the rental market is under so much constraint that it has been hard to draw any conclusion or monitor any impact on prices. Several municipalities have launched "enforcement pilots" to work with landlords on improving their properties.
- Flanders is a leader in terms of energy efficiency obligations in Belgium, and the results it has achieved thus far in terms of work volumes are encouraging.
- The Netherlands places an emphasis on MEPS in commercial buildings. For households, it focuses on decarbonising heating through a "renewables ready" standard.

France – Minimum energy performance standards in rental properties to make a dwelling "decent"

This example in France shows that implementing broad MEPS in the rental market is not enough - the objectives must go further, sooner, and deeper, and attention must be paid to ensure that it does not create renoviction.

In France, energy performance standards only concern properties on the rental market. They are one of the tools the country is implementing to eradicate what the French call "passoires énergétiques" - "thermal sieves", the most energy-intensive dwellings. They are part of a broader discussion on the "decency" of the dwelling and addressing unfit housing. French MEPS were introduced with the 2019 and 2021 Climate Laws, the legislative translation of the 2020 Citizens' Climate Convention.

To be rented as the tenant's primary residence, a property, whether empty or furnished, must be 'decent'. However, until now, the energy aspect (minimum energy performance threshold or ceiling on the cost of energy spent by the tenant) was overlooked. From 2023 on, a dwelling will be qualified as "energetically decent" when its final energy consumption reaches certain thresholds. Landlords will have to renovate their properties following the below timeline (de Particulier à Particulier - PAP, 2022):

- High energy consumption dwellings beyond the G class (over 450 kWh/m2 per year in final energy - heating, lighting, hot water, ventilation, cooling, etc.) will be excluded from the rental market from 1 January 2023 onwards (Loi 2019-1147, 2019). The properties concerned (90,000 in total, of which 70,000 are privately owned) will no longer be able to be put up for rent after this deadline.
- The energy performance standards for renting will be raised progressively, using the revised energy performance certificate[12]. Thermal sieves will be considered indecent and banned from the rental market from 2025 for class G (around 600.000 dwellings) and in 2028 for Class F (approximately 1,200,000 homes). Furthermore, from 1 January 2034, dwellings classified as E (approximately 2,600,000 dwellings) will no longer be able to be rented out (Loi 2021-1104 2021).

Besides, renters are receiving increasingly precise information in the advertisement and the rental contract from 2022, and the law of 16 August 2022 on purchasing power also prohibits any rent increase for housing graded as F or G by the energy performance certificate (DPE).

The energy performance certificate has also been revised. Since 2021, it no longer only considers primary energy (in kWh): it also includes greenhouse gas emissions (in CO2 equivalent), which used to appear on a separate climate label. The tool also becomes legally enforceable, meaning that a buyer or a renter can act against the seller or the landlord if there is an error in the energy class assigned. There are 5.2 million thermal sieves today, 400,000 more than in 2018. The new certificate has made it possible to lower the rate of homes heated with fuel oil or gas, which therefore have a high rate of CO2 emissions (Ministère de la transition écologique et de la cohésion des Territoires 2022).

12 The energy performance level of the certificate is expressed in kilowatt hours of **primary** energy per square metre per year, for energy consumption, and in kilograms of carbon dioxide per square metre per year for induced greenhouse gas emissions.

Issues and lessons learned

Many NGOs denounce the low environmental ambitions and the very long timeline to implement these measures.

An expert from CLER, the French network for the energy transition, interviewed for this report, regrets that "the ban on renting out thermal sieves will only come into force on 1 January 2023, for dwellings that consume more than 450 kWh/m2/year in **final energy**. In other words, very few of them, since this threshold excludes almost all housing heated with electricity in 2023. It affects around 90,000 dwellings in France. This threshold will be progressively raised until 2034". Indeed, using primary consumption determined by the certificate will raise the thresholds from 2025.

Sarah Coupechoux of the Fondation Abbé Pierre, interviewed by CLER, noted that Class G only concerns 1.7 million primary residences, compared with around 7 million excessively energy-intensive homes (CLER - Réseau pour la transition énergétique, 2022b).

The obligations only concern rental accommodation and will come into effect when the lease is renewed. Ongoing contracts and owner-occupiers are therefore not affected by these measures. Tenants in energy poverty should, therefore, also be given the means to defend themselves against landlords who do not take the necessary steps in the meantime. Sarah Coupechoux believes that "tenants are not going to take legal action when the obligation is not respected". By extension, one might ask whether the most destitute would not risk falling into even more indecent housing.

There is also a need to protect tenants from the risk of renoviction, i.e. an unreasonable increase in rent to cover renovation costs, which would drive out low-income households households.

Challenges and opportunities to enforce MEPS in the UK

This example in the UK demonstrates the importance of having a "carrot-and-stick" approach towards landlords, as they may not be aware of the needs and solutions that exist.

Privately rented homes comprised around 20% of English households, 13% of Welsh households and 15.5% of Scottish households in 2018 (Sunderland and Santini, 2020). Homes in this sector are generally in a worse state of repair than owner-occupied or social sector homes. Actions targeted at private renters are therefore critical.

In England and Wales, minimum energy efficiency standards (MEES) were introduced in 2015 and have been in force since 1 April 2018. These regulations extended to all privately rented domestic properties from 1 April 2020, not just those undergoing a tenancy transaction, and will expand to all non-domestic privately rented properties from 1 April 2023 (Sunderland and Santini, 2020). They are closely related to Energy Performance Certificates (EPCs). The legislation prevents landlords from renting out or continuing to rent F and G-rated properties.

When landlords fail to comply or register a valid exemption, they are committing an offence and are at risk of a financial penalty of up to £5,000 per breach and property. However, they cannot be required to spend more than £3,500 (including VAT) on energy efficiency improvements. Beyond this threshold, they can register an 'all improvements made' exemption (Department for Business, 2020).

Even though it has not been possible to evaluate the impact of these measures fully, the Government has recently proposed to increase the minimum EPC rating to C on new tenancies by 2025 and all tenancies by 2028 (Brighton & Hove City Council, n.d.).

In Scotland, the target is to have no more than 5% of people in fuel poverty by 2040, with <1% in extreme fuel poverty (Fuel Poverty (Targets, Definitions and Strategy) (Scotland) Act 2019). Policy targets and instruments are very ambitious, and for instance, the 2020 Energy Efficiency (Private Rented Property) Regulations set out a minimum energy efficiency standard for domestic properties: all privately rented homes (including houses of multiple occupations) must meet an energy performance certificate class E in 2022 and D in 2025. However, enforcement has been delayed due to the COVID-19 crisis (Sunderland and Santini, 2020). Therefore, Scottish lawmakers decided to skip the 'E' requirement in April 2022 and replace it with a 'D' requirement. They have since opted to align their proposal with England and Wales, which means that in 2025, Scottish tenancies will require a 'C' rating (CJ Hole, 2022). The cost cap is slightly higher than in England and Wales, at £5,000.

Besides, on 19 October 2021, the government released its long-awaited Heat and buildings strategy (HiBS), aiming at eliminating 'virtually all emissions arising from heating, cooling and energy use in [Scottish] buildings' by 2045. It aims to reduce carbon emissions in 2035 in buildings by 47-62%. To do this, the Heat and buildings strategy seeks to bring all homes up to an EPC C certified standard with fabric insulation measures by 2035 and ban direct emissions heating systems (DEHs) after 2045 (though the rollout of heat pumps and heat networks where they are the obvious solution). The government is planning to prioritise the decarbonisation of new build homes and off-gas grid homes (National Housing Federation, 2021).

Interestingly, Scotland aims to revise its Energy performance standards to include three metrics: energy efficiency rating (by use), energy cost rating, and carbon emissions rating. Energy Use consists of the modelled energy supplied to the dwelling from the grid, including heating system efficiency. It provides indicative energy use based on kWh/m2/year. The energy use rating is a new metric on the EPC. This revision would boost electrification over gas boilers (Scottish Government, 2021).

Scotland can count on a solid framework of advisory and funding and finance support for energy efficiency and renewable energy in homes, such as Home Energy. Interest-free loans (up to £38,500) are available for homeowners and government grants for low-income or fuel-poor households for energy efficiency and heating. Besides, local authorities are proactive in identifying hard-to-reach homes and hard-to-treat properties, providing measures at little or no cost (Sunderland and Santini, 2020)

Issues and lessons learned

The obligation to obtain an EPC does not apply to protected, historically significant buildings, houses of worship, temporary structures, and low-energy industrial and agricultural structures. An EPC is only created when there is a change in ownership or tenancy, thus properties that have not undergone a transaction of this nature since the EPC standards were enacted are not subject to the minimum standard requirement. Homes with multiple occupations sometimes don't meet the basic requirement ("This category refers to buildings in which individual rooms are let out separately to tenants who often share kitchen and bathroom facilities" (Sunderland and Santini, 2020)).

Many exemptions water down the impact of this measure. The government predicts that 52% of obliged buildings could not be upgraded to EPC class E within this cost cap, hence the £3,500 cost cap for residential properties is too low to enable a successful strategy. Additional exclusions are possible if a landlord can demonstrate that the required efficiency improvements will have a detrimental impact on the fabric structure of the property or diminish its market value by more than 5%. Tenants and other parties have the ability to refuse work approval as well. Finally, under some

instances, new landlords may seek for a six-month compliance extension. Exemptions are normally valid for five years, after which time a landlord must comply with the requirements or request for a new exemption (Sunderland and Santini, 2020).

In an interview with FEANTSA, Louise Sunderland explained that those measures only concerned the rental market because when they were introduced in 2010 it felt "more politically acceptable to regulate landmarks which were making money out of - regulating a business, not an individual householder".

Louise Sunderland has not been able to assess the results of these measures so far. She said that the rental housing market in the UK has been under so much pressure recently from the COVID-19 pandemic, "market pressures, availability, housing shortages, that [it] has massively eclipsed any price changes we might have seen as a result of just the standard itself." Besides, Louise Sunderland noted that the standards were fully enforced in 2021 when local authorities ran out of money and human resources.

Regarding enforcement, local authorities need carrot-and-stick approaches. The expert believes that local authorities should "work with landlords, identify them, identify the homes that need to be improved, work with them to help them identify the technical solutions for their home and then also help them finance it. (...) Enforcement needs to be as much about enabling as it is about enforcing. Because the point isn't to punish people but to make the homes more efficient."

The UK implemented several "enforcement pilots" that are "about helping them to gather data (...), identify landlords, reach out to landlords through their landlord forums, for example, their landlord associations, find who they are, communicate with them, identify them and direct them into the relevant support to make sure they know about the standards", the expert added.

In Belgium, Flanders lead the way of energy renovation

In Belgium, Flanders is a pioneer in energy efficiency obligations, with encouraging results so far in terms of work volumes.

In Belgium, regulations on building energy performance are set at the regional level.

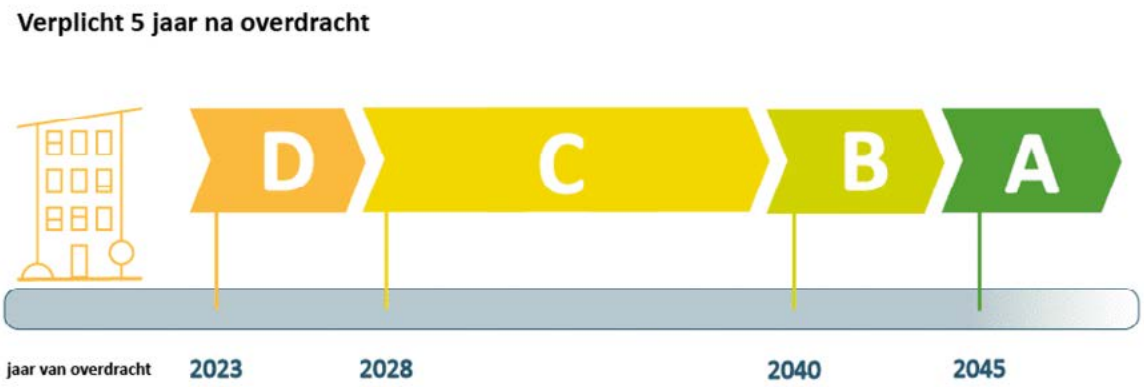
Housing quality standards were introduced in Flanders from 2015 onwards, focusing first on roof insulation. The measures have since been extended to include housing quality issues and glazing thickness. Together they form a point system: above a specific value, the property (house, flat, room, studio, student room, etc.) is no longer fit for renting, and inhabitants can oblige the owner to carry out the necessary work or demand the dissolution of the rental contract as well as financial compensation. However, not all municipalities require a certificate of compliance that would prove those minimum standards. Besides, a report by RAP noted that "enforcement is only for rented homes; owner-occupiers can still sell their home if it does not meet the standard" (Sunderland and Santini, 2020).

There are many available tools such as Mijn VerbouwPremie (= "My RenovationSubsidy"), which includes one-stop-shops combining renovation and energy efficiency subsidies, increased subsidy levels (post-COVID) that can be combined with reduced property taxation after renovation works and interest-free loan up to €60,000.

All this might explain why efficient renovation work is becoming increasingly popular. An article in the Belgian newspaper De Zondag reports that in 2021, "twice as many houses in Flanders have been built or renovated in a more energy-efficient way than the applicable standards require" (The Brussels Times, 2022).

The following steps are the minimum energy performance standards for residential buildings, such as single-family homes and apartments. As of 1 January 2023, all houses and apartments purchased with label E or F will have to be renovated to label D or better within 5 years after the purchase. By 2050, all homes should be renovated to Label A. Intermediate objectives have been set for 2028, 2035, 2040 and 2045 (Vlaanderen.be, n.d.).

FIGURE 2 – SCHEMATIC PATH OF THE LONG-TERM COURSE FOR MULTIFAMILY HOUSINGS (VLAANDEREN.BE, N.D.)



In Brussels, the renovation strategy is called RENOLUTION. Its objective is an average energy performance level of 100kWh/m²/year for all Brussels housing in 2050 (level C+ of the energy performance certificate), i.e. an average consumption divided by 3 compared to the current situation.

RENOLUTION's ambition is to offer a support system extended to financial aid, low-interest loans, adapted property taxation, simplified administrative formalities, a single point of contact, and technical and administrative support at every stage. It seeks to meet the requirements of each target audience, including tenants and condos (40% of housing), who will have access to tailored support and financial assistance. The RENOLUTION website states that "everyone must be supported to be able to take part in the energy transition" (Bruxelles Environnement, 2022).

As regards the enabling framework, the upgraded EPC is designed to give information and aid in regulatory compliance. Low-interest loans are also available for lower-income households, as are renovation subsidies that vary by income but can cover up to 20% of qualifying expenditures on average. (Sunderland and Santini, 2020).

As an alternative to MEPS, the Netherlands' 'renewables ready standard' to decarbonise heating

This example from the Netherlands shows an alternative to MEPS, the 'renewables ready standard', to make sure that housing renovation are ready to switch to more sustainable heating sources.

In the Netherlands, so far, minimum standards concern only office buildings. By 1 January 2023, all office buildings must have a minimum energy performance certificate of C (Sunderland and Santini, 2020).

The Netherlands is now aiming to target the housing market through 'renewables ready standards", i.e. a future-proof housing installation standard based on the type (single or multifamily home) and age of the dwelling (pre or post-1945). These standards would support the national phaseout of the fossil gas system by 2050. In practice, dwellings would be ready for whichever sustainable heat option the local government deems most appropriate in

their region, such as heat pumps or district heating. Interestingly, this measure is also linked to the neighbourhood approach (Sunderland, 2022).

Louise Sunderland considers this a far more logical place to start and a valid norm. When homeowners need to install a heat pump or replace their boiler and fossil fuel boiler, it ensures the proper amount of insulation has already been reached, rather than having to make further decisions after obtaining the E rating. Most recent homes would reach class A or B of the energy performance certificate, while pre-war homes would indicatively achieve a D label.

Although the renewables ready standard has been on the energy label since 2019, it is still advisory - the next legislature will decide whether or not to make it mandatory for landlords. However, rent regulation and the housing valuation system could be adapted in the meantime to stimulate the adoption of the standard in the rental sector.

Moreover, in April 2022, the Dutch government launched a National Housing Insulation Plan to reach those dwellings that do not yet meet the insulation standard. 2.5 million homes could be insulated by 2030, starting with those with an E, F or G energy label (Sunderland, 2022).

4 Discussion

POSITIVE SOCIAL IMPACTS

Improving the quality of life, addressing unfit housing, and reducing the risk of energy poverty

Renovation of a dwelling, if well designed, represents an excellent opportunity to improve housing conditions of the lowest-income households, adapt it to current conditions of comfort and decency. It allows low-income housed people to envisage a better future, raise a family, and even grow old in their own homes rather than being rehoused in retirement facilities. Energy efficient renovation has the potential to drastically reduce energy demand, which is one of the main factors of energy poverty. Studies show that deep renovation could cut up to 90% of a building's energy consumption (Economidou, 2022). Another social benefit is increased usability of all areas of the home, where previously it may only have been possible to keep one room warm enough to sit still in for an extended period of time. This makes it easier for household members to have a quiet place to study or work from home, which is becoming more common. (Maby, 2020)

The energy performance improvement usually shows immediate physical and mental health effects. Indeed, the worst-performing dwellings are often more humid, and housing pathologies (such as moulds) can have health consequences (respiratory, cardiovascular) for the occupants of these dwellings. A report published in France showed that the occupants of "the 5% of the most energy-intensive dwellings, particularly those on low incomes, are exposed to an increased risk to their health". The study found an average annual health cost of up to €7,500 per year, including €5,700 in social costs related to mortality, €1,400 in loss of well-being and €400 in health costs. In practice, the energy renovation of the 1.3 million dwellings whose final consumption for hot water, heating and air conditioning is above the threshold of 378 kWh/m² per year to a level of consumption at least equal to 225 kWh/m2/year would prevent the death of 2,200 people each year. The study estimates that the energy renovation of all the "thermal sieves" would avoid a health cost of 10 billion euros (Ministère de la Transition Ecologique, 2022). Other research has also demonstrated links between better mental health and self-esteem and lower anxiety, thanks to improved living comfort following renovations (O'Connell et al., 2022). FEANTSA gathered first-hand experience of the impact of fuel poverty on health during its field visit to Cañada Real (Spain) in September 2022 . (FEANTSA, 2022d).

Reduced rent arrears and voids benefitting landlords

As a previous FEANTSA report pointed out, there are also benefits to landlords of rented properties. Energy efficiency improvements decreased rent arrears and voids (unoccupied dwellings), according to 2015 UK research, with clear financial advantages for landlords. It was found that there was a relationship between the energy efficiency of the homes and the number of days that they were vacant, with more energy efficient homes being unoccupied for a shorter time: 31% less time on average for properties with an energy rating band level B compared to those in level E and F (Maby, 2020).

Trust and broader community benefits

Links have also been demonstrated between renovation and trust through the willingness to receive future assistance from service organizations (O'Connell et al., 2022). As we have seen in the examples from Madrid, Vienna, or with the Eco-Habitat Network, the active participation of beneficiaries with local support is one of the keys to turning environmental impact into broad social and community impact.

Renovation policies can also represent a first step out of the logic of housing financialisation and the adoption of a more community-based approach. The not-for-profit approach could help counter speculation, particularly over empty housing, contain rent increases and avoid evictions due to gentrification and housing partitioning. COST ENGAGER, the network of energy poverty researchers, suggests that "owners should get supported to get into these forms of solidarity housing. They should have priority access to public one-stop-shops to support energy renovation in homes occupied by vulnerable people, ease red tape and guarantee that renovation reaches those who need it most." (Barella et al., 2021)

Positive economic impacts

Establishing European standards on minimum performance for a climate-neutral building stock, such as MEPS, could provide a solid basis for national standards to tackle energy poverty in the long term. From an economic point of view, this would create more certainty in the markets, thus stimulating the production of high-quality insulation components. Local artisans would clearly know how to improve their skills while training and hiring additional workers. One-stop shops could become more attractive, and banks could develop adapted financial products (such as reduced loans for good energy performance).

POTENTIAL REBOUND NEGATIVE SOCIAL IMPACTS

The problem of unsustainable and unfit renovations

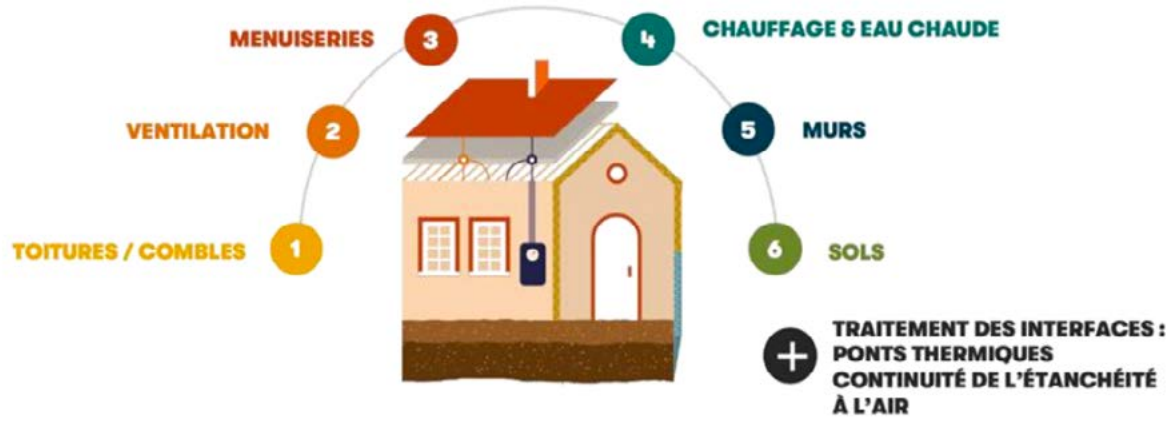
Most frequently, renovations involve only a few tasks. The energy and financial savings might be minimal and may create more negative externalities than actual improvements in living conditions. This raises the question of whether it is sustainable to mobilise a dwelling and stress its inhabitants to move from a poor energy category to a barely better one.

As the examples in Hungary clearly illustrate, renovations that only target the external facades are problematic because they do not create the opportunity provide more comfort and modernity to the inhabitants; they are only "cosmetic". During a renovation, the whole building should undergo a fitness and safety check (for instance, electrical wires). Likewise, energy performance certificates solely based on final energy and not primary are tricky, as they do not acknowledge the lived experience of the occupant, as pointed out in the French examples.

Moreover, renovations done in disparate orders or improperly can create unnecessary expenses and even further problems in the dwellings, such as dampness and mould. One of the reasons is that some operations rely technically on others, and often there is no proper strategy or guidance, either technical or social. ADEME, the French agency for energy transition, has summarised in a report the correct order to carry out significant renovation works (ADEME, 2021):

1. roofs and attics
2. ventilation
3. carpentry
4. heating and hot water
5. walls
6. floors
7. treatment of interfaces: thermal bridges, airtightness

FIGURE 3 – OUTLINE OF THE 6 WORK PACKAGES REQUIRED FOR THERMAL PERFORMANCE



Source: Dorémi (ADEME, 2021)

Unrealistic energy improvements

Sometimes the renovation does not lead to energy savings. When "before" energy uses are overestimated, this is called the 'prebound' effect – as opposed to the 'rebound' effect, where savings are absorbed by other uses (Sunikka-Blank and Galvin, 2012). A rebound effect might also happen if energy needs were unmet before the renovation, leading to increased "after" consumption. In practice, it means that the policies or programmes are not as cost-effective as planned and that the ecological impacts of these measures need to be adjusted.

Funding streams

Most renovation programmes do not cover all the work and administrative support, even the very generous Italian "110% bonus". This raises the question of the remaining costs, which can be a deterrent. Moreover, the voice of low-income tenants or owners of multifamily housings is often neglected, while their renovation needs might be more pressing and their financial leeway limited. For instance, they might have limited capacity or willingness to access loans. Member States must apply targeted measures, and dedicated funding streams toward low-income owners and implement consistent programmes to address the split incentive.

There are still many barriers to the most vulnerable homeowners accessing formal bank finance. First, many homeowners may not be able to stretch their financial resources and repay even a 0% interest loan on top of mortgage payments. Besides, for clients, barriers can include distrust of the banking sector, reluctance to borrow money, lack of availability of savings and disposable income or even lack of banking history, high cost of credit and ineligibility due to lack of collateral and short time frame, cost of energy assessment and other upfront costs, the complexity of accessing public assistance programmes, lack of technical assistance and discomfort during renovation. On the banks' side, barriers include low profitability of small renovation loans due to high fixed costs, lack of collateral on renovation loans, and lack of expertise in energy renovation, certification, and auditing.

Lack of acknowledgement of the social factor

Renovations are often approached from a technical point of view, without considering the information and support aspect for households, according to their characteristics. Yet, building trust is critical for the political acceptability of the climate-friendly policies. All projects should be based on lived experience, as expectations and needs change (for example, needs change with ageing). Renovation should be an opportunity to think about the evolution of housing. Besides, social support can

be critical to help people develop new habits, for example, ventilation or heating of rooms.

This also means paying better attention to the specific needs of people living in social and temporary accommodations (e.g., hostels, shelters, refuge accommodations, etc.). Those places are often overlooked, while they fulfil a significant social role when all previous safeguards have failed. They also need improved energy performance to boost their social impact, as Fratello Sole in Italy acknowledges.

Affordability crunch

Throughout Europe, the expected increase from modernisation and refurbishment typically ranges from 3 to 8% in the price of residential properties due to energy efficiency improvements and an increase of around 3 to 5% in residential rents compared to similar properties (Zancanella et al., 2018). These increases may become unaffordable for many people and increase homelessness. Combined with inflation and stagnating wages, this can create "an affordability crunch with cascading effects."(del Valle, 2018)

Accelerated renoviction and gentrification

Energy efficiency and renovation work are merely the tips of the iceberg: they might hide structural injustices behind housing, urban planning, and territorial development. Indeed, energy-efficient housing improvements are probably one of the best ways to overcome energy poverty in the long run. However, case studies and scientific literature accumulate examples showing that many (unearmarked) renovation programmes and state-imposed energy standards are not necessarily leading to an improvement in the situation for low-income households. On the contrary: it could lead to speculation. This phenomenon is called "renoviction", where greater social injustices, such as evictions, occur because of energy renovation and neighbourhood gentrification. In practice, rent control mechanisms allow for rent limitations, especially for new leases, but renovation is often an exception enabling them to bypass them. Hence, renovation might lead to increased rents, displacement, and segregation. As low-income people look for affordable rents, they move to neighbourhoods where energy efficiency works have not (yet) taken place (Bouzarovski et al., 2021).

More broadly, if renovations policies happen at a large scale, such as at the whole neighbourhood level, it might increase gentrification and the further segregation of marginalised communities. For local authorities and many residents, it might mean improving the "reputation" of the area and a more prominent feeling of safety and comfort for women and families. However, as Canadian author and scholar Leslie Kern explains, "when a space becomes "respectable, safe, middle-class, and desirable" for women, it might also "signify danger of exclusion for people of colour, Black people, trans folks, disable people, Indigenous people and others for whom spaces dominated by whiteness and normative bodies are not welcoming", pushing them even farther into the edge of society. In short, "making cities *seem* safe for women also tends to make them less safe for other marginalized groups". This is precisely what happens in California. She invites the creation of intersectional approaches to safety and urban regeneration that would better acknowledge the different expectations and lived experiences of the various communities (Kern, 2020).

The danger of one-size-fits-all policies

As we have seen, there seem to be as many examples of the renovation as there are regions and cities in Europe. This is due to the heterogeneity of the history of housing, urban development, climate, and economic or associative fabric... Some cities and countries have a long tradition of municipal housing (like Vienna). Others, on the contrary, have almost none, such as Greece. In some cases, funding for renovation is on a first-come, first-served basis (in Bulgaria); in others, the impetus for the work is open and calmed through social dialogue (to some extent in Slovakia or Madrid). There should not be a one-size-fits-all approach. On the contrary, the European Union should demand that the governance of renovation policies and programmes be well targeted to the needs of the local populations, including for racialised, marginalised and disabled people. The EU can further foster and support the local level to make things happen.

5 Conclusions - Recommendations

Prioritise deep renovation in the least performing homes of the people living in energy poverty

The Renovation Wave plan and instruments represent a unique opportunity to improve the European housing stock, but to be effective, least performing housing that is inhabited by low-income and most vulnerable people must be prioritised, with the necessary safeguards to ensure that rents, mortgage, or direct or indirect housing taxes do not increase. This will only be possible if ambitious public funding (EU and national) is mainstreamed for renovating the worst-performing buildings and the homes of people facing energy poverty.

Priority should also be given to retrofitting unfit housing and temporary accommodation (e.g., hostels, shelters, refuge accommodation, etc.) and transforming them to improve energy performance and social impact.

In multifamily housings, it is critical to address the whole building and its structural performance. This allows structural gains to be made, to include all inhabitants without stratifying them according to their financial capacity. This is even more important given the high percentage of the building stock created before the 1990s when building standards were non-existent.

Overall, deep and "one-shot" interventions, allowing significant improvements of the quality of life and energy consumption should be prioritised. Beyond the technical aspect and the risks of "doing it wrong", renovations may be perceived as an invasion of privacy and could suppose that they leave their dwellings for a given period. A socially just renovation is, therefore, also a deep one that offers hope in the long term.

Revising the Energy Performance Certificates

The revision of the Energy Performance certificates should be an opportunity to better take into account the living conditions of the inhabitants, as defined at the national level or by the ETHOS framework, and also their readiness for decarbonisation needs. That would enable to target damp and cold housing, but also informal settlements, homeless shelters, and other forms of inadequate housing, and to consider housing as a social right and not an investment opportunity.

Designing financial tools for the low-income

When 100% grants cannot be guaranteed, the remaining costs should be kept as low as possible and not limited beyond a certain threshold. As energy prices and inflation rise, it seems all the more critical to ensure that costs are contained for the lowest-income households. This means earmarking the highest share of financial support measures for them to enable energy efficiency gains. Failure to act will only increase costs in the long term. Given the not-so-obvious return on investment for low-income or very vulnerable households, grant support covering more than 100% of the retrofitting costs should be considered. In practice, broader support is also needed to help manage the renovations beyond the financing challenge, for instance through support in identifying the work force, or through temporary relocation.

A "European Cold House Fund" would allow for this type of public funding and could be financed by the European Structural Funds, revenues from the existing EU Emissions Trading Scheme or by a contribution from large construction companies benefiting from contracts linked to the renovation wave (FEANTSA, 2022e).

The Social Climate Fund, proposed by the European Commission in July 2021, could be part of the solution but currently relies on inappropriate funding that would exacerbate the energy poverty it claims to eradicate. It remains to be seen whether this proposal can be improved to allow for a real investment fund for adequate housing.

Prevent renoviction

The European Union cannot oblige member states to ban post-renovation eviction, but it can raise awareness of the issue. The EU could encourage rent caps and renoviction bans to be implemented where they do not exist.

It would be relevant to map better the size of the private rental sector to detect how and to what extent energy efficiency renovations influence rental prices and could contribute to tenant eviction. A further study could look at the difficulties of low-income owner-occupiers.

If rent increases due to renovations while heating costs decrease due to improved energy efficiency, the rent increase should be proportional to the energy savings. Public subsidies could be tied to the security of tenure (if tenants do not stay, the landlord does not receive a refund).

Ensuring the implementation and enforcement of the right to housing

Article 31 of the European Social Charter recognises the right to housing and homelessness prevention. There are binding obligations on the EU Member States to ensure the right to housing. In the case of evictions, it imposes legal protections on those threatened with eviction. These protections must include the following:

- a ban on evictions at night or in winter
- access to legal remedies,
- access to legal aid,
- and compensation in the event of unlawful eviction.

The EU should ensure that the right to legal aid also applies in the case of renovations that could lead to evictions, for example, by guaranteeing legal representation in the case of evictions. There is an obligation to consult the parties concerned to find alternatives to eviction. Still, above all, there is a need to go back to the source and to be able to better integrate vulnerable tenants and landlords in the renovation decision-making processes.

In practice, the most vulnerable may find it difficult to turn to the appropriate organisations to help them. The single points of contact should therefore include a legal support service, which could link to the energy ombudsman services or consumer associations.

The monitoring framework for renovation programmes should include more robust and relevant social impact indicators, specially adapted to monitoring housing outcomes for low and very low-income households, distinguishing particularly between tenure status.

Social and community housing

The EU should encourage earmarking funds to refurbish social housing and convert long-term unused and vacant housing stock for use by social housing providers.

Non-market housing, such as public and social housing, and non-profit organisations, such as cooperatives and co-housing initiatives, that aim to boost social integration should be encouraged.

Thinking beyond the building: sustainability, horizontal participation, and inclusiveness

The Renovation Wave needs an approach centred around Human Rights, inclusivity, non-discrimination and intersectionality, by placing the right to energy services, housing, health and water at its core and valuing diversity.

National housing strategies should be prepared following extensive consultation with multiple social and economic actors. The process should take an integrated and holistic approach with horizontal measures in all sectors and policy areas (rent regulation, building regulation, taxation, environmental and energy policies, and social policies, among others) with green and social justice at its centre.

Besides, the Renovation Wave implementation and housing strategies should trigger more general reflection on social sustainability, such as the social reality of an ageing population, cohabitation of various age groups, and diversity of use in housing.

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