CAN Europe's Feedback on Call for Evidence European Affordable Housing Plan

Summary:

Climate Action Network (CAN) Europe is Europe's leading NGO coalition fighting dangerous climate change. The polycrisis we are currently living in, which is marked by climate change and the high cost of living crisis (which is exacerbated by the high volatility of energy prices), has deep ramifications on the functioning of our housing markets, and calls for a coordinated response. It is for this reason that we welcome the efforts of the European Union in addressing the current housing crisis by launching an European Affordable Housing Plan.

Here below, a summary of our proposals when it comes to the content and role of the EAHP:

- Establishing a common language for adequate housing: Adequate housing is a recognised human right under international law. Despite existing legal definitions, criteria differs widely across EU countries. Energy performance, ventilation, heating, and protection from environmental hazards are consistently referenced. These contribute to Indoor Environmental Quality (IEQ), further emphasized in the 2024 recast Energy Performance of Buildings Directive (EPBD). To ensure coherent implementation under the EAHP, a harmonized understanding of "adequate housing" based on EU legislation and tailored to households' needs will be crucial.
- Coordinated action and strengthening of EU legal tools: energy performance levels directly affect monthly housing costs, thus affordability of housing. Energy poverty is a worrying phenomenon that needs to be tackled via a coordinated approach. To ensure the latter, the Plan must align with other EU initiatives (i.e. Citizen Energy Package, EU anti-poverty strategy) while supporting the implementation of EU Directives that directly respond to this issue (such as EED and EPBD).
- Increasing affordability of (deep) energy renovations: The Plan should ensure that the post-2027 Multiannual Financial Framework creates the foundation of an EU enabling framework that will ultimately support Member States in scaling up (deep) renovations rates on the ground. Integration of different funding streams, such as the Social Climate Fund and revenues stemming from the new EU Emissions Trading System (ETS-2) can further mitigate the impact of rising energy bills on low-income households and energy poor. When it comes to designing financial incentives, inclusiveness needs to be strengthened. Public funds should be targeted at those most in need, while de-risking private investments to reach more households (i.e. via pre-financing mechanisms). The pan-European Investment Platform should be leveraged to facilitate this blended approach.
- Optimising housing supply and smart urban planning: Optimising existing buildings (especially vacant/empty spaces) reduces CO2 emissions, prevents urban sprawl, and regenerates urban areas. The Plan should support adaptive reuse through better data, clear definitions, and administrative capacity. Public buildings can lead the way, with strategic frameworks promoting their repurposing. Incentives should also enable private owners to convert vacant properties into affordable homes. Integrated district/neighbourhood renovation strategies can deliver multiple benefits (i.e. energy efficiency, social revitalisation, and climate resilience) therefore replication across Europe should be further supported.
- Enhance multi-level governance, stakeholder engagement: Local authorities, being closest to people, must be central to planning and implementation. Enhanced cooperation through regional/local hubs, observatories, and one-stop-shops can ensure policies reflect local needs. Engaging civil society, industry, and social partners will lead to better-informed,

broadly supported solutions. The renovation sector is vital to EU competitiveness. As demand grows, the Plan must ensure job quality, safety, and fair conditions. Partnership with unions and social groups will help secure fair wages, training, and inclusivity.

Introduction

Climate Action Network (CAN) Europe is Europe's leading NGO coalition fighting dangerous climate change. We are a unique network, in which environmental and development organisations work together to issue joint campaigns and maximise their impact. With over 200 member organisations active in 40 European countries, representing over 1,700 NGOs and more than 40 million citizens, CAN Europe promotes sustainable climate, energy and development policies throughout Europe. When it comes to our work on the energy transition, our goal is to deliver a "Paris Agreement Compatible"[1] decarbonisation pathway that leaves no one behind. Across all end-use sectors, the energy transition of our built environment clearly intersects with different dimensions that go well beyond energy and climate, touching upon the daily lives of households and communities across the whole European Union.

CAN Europe leads together with Friends of the Earth Europe the multistakeholder campaign Build Better Lives that unites more than 90 organisations (trade unions, housing, social justice organisations) to ensure decent, affordable and efficient homes for all. In light of the polycrisis we are currently living in, which is marked by climate change and the cost of living crisis, which is exacerbated by the high volatility of energy prices due to a strong dependence on fossil fuels; the ramifications that the latter have on our housing markets, calls for a coordinated response.

It is for this reason that CAN Europe welcomes the efforts of the European Union in addressing the current housing crisis by launching an European Affordable Housing Plan. We support its aim to increase investment in sustainable and affordable housing at all levels of government, prioritising the people most in need, and fix market inefficiencies by better matching supply with housing needs. We also value its commitment to achieve this through innovative, inclusive solutions that protect the environment and support the shift to renewable energy and energy efficiency.

First and foremost, before deepening our views on what the upcoming European Affordable Housing Plan should encompass, it is important to highlight that the topic involves various dimensions, combining economic, social, energy, environmental considerations and more. For this submission, and in line with CAN Europe's work, we will majorly focus on the role that energy performance of buildings in the European Union has in alleviating the current housing crisis. Decarbonising our homes, if done in a socially just and climate ambitious way, can in fact positively impact the affordability level of housing costs, promote social inclusion, reduce greenhouse gas emissions and spur inclusive and innovative urban planning approaches.

Delivering decent and affordable housing to all: a common language, coordination across initiatives, and strengthening of legal tools

Creating a common language:

Having access to decent or "adequate housing" was firstly recognized as part of the right to an adequate standard of living in Article 25 of the 1948 Universal Declaration of Human Rights and in article 11.1 of the 1966 International Covenant on Economic, Social and Cultural Rights. According to the latter, residents shall be provided with "*adequate space and protection from **cold, damp, heat**, rain, wind or other threats to health, structural defects, and disease vectors to protect their physical safety*".

On the same line of the international definition, across European countries, there are different criteria to define decent/adequate housing at national level[2]. Across the different existing definitions the factors "**energy performance**" levels, and other aspects such as "**ventilation**", "**damp**", "**heating**" etc. seem to be common

[1] https://www.pac-scenarios.eu/
[2] https://www.feantsa.org/public/user/Resources/reports/2023/OVERVIEW/CH3.pdf

elements that contribute to the delivery of healthy indoor spaces. The latter can be broadly linked to the concept of **indoor environmental quality (IEQ)**, which is defined in the 2024 Energy Performance of Buildings Directive (EPBD)[3], and its role reinforced in the contexts of major renovations and new constructions[4].

Considering that definitions and criteria can greatly differ from one national reality to the other, **it will be important within the context of the European Affordable Housing Plan to create a common understanding (which starts from existing EU legislation) around what we deem "adequate housing", including how it should respond to households' specific needs[5] and which enablers it proposes to reinforce its actual delivery on the ground**. Investing in the energy performance levels of homes and creating a better role for energy efficiency (and more) in delivering high IEQ levels can support the creation of a common approach for the delivery of decent homes for all.

Coordination across upcoming and existing initiatives:

Being able to comfortably heat and cool one's own home across seasons is also one of the criteria to define "energy poverty". The latter is a worsening trend hitting more and more households across the European Union. As mentioned in the call for evidence, and more broadly, this phenomenon is the result of a combination of different factors, such as the cost of living crisis, which to a large extent is driven by high and often volatile energy prices[6], inefficient buildings (which account for around 75%[7] of the whole stock), and the climate crisis. Approximately 48 million people in the European Union (almost 11% of the total EU population) are unable to keep their homes adequately warm[8]. Now, because of the rising temperatures[9], more and more households are also experiencing "summer energy poverty". Up to 19% of households[10] - over 80 million people - have in fact declared not being comfortably cool in summer, according to Eurostat data.

Therefore, reducing the demand for energy of our homes and decarbonising their heating and cooling systems not only has a direct effect on our environment and energy system[11], especially in view of the work of the European Affordable Housing Plan, it delivers healthier and more comfortable places while reducing and stabilising households' monthly expenses related to housing. **There are different tools and initiatives at EU level that focus on alleviating energy poverty, which could combine and better integrate the housing crisis dimension to create a more coordinated and integrated approach to the issue.** For instance, and more generally, at EU level, the European Affordable Housing Plan needs to be coherent and complementary with initiatives such as the upcoming Citizen Energy Package, and the first-ever EU Anti-poverty Strategy, where a stronger gender dimension should also be included. One more pragmatic example of this approach could also be integrating a stronger housing expertise in the work of the Energy Poverty Advisory Hub, especially when it comes to provide technical assistance to national and sub-national authorities in rolling out projects to tackle energy poverty.

Strengthening of existing legal tools:

When it comes to improving the performance levels of buildings and homes, and tackling energy poverty, it is again important to highlight **the crucial role that the European Affordable Housing Plan could have vis-a-vis providing support for the implementation of EU legislation on the ground, especially the Energy Efficiency Directive (EED) and the Energy Performance of Buildings Directive (EPBD)**:

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[3] Article 2 point 66) Indoor environmental quality means "*the result of an assessment of the conditions inside a building that influence the health and wellbeing of its occupants, based upon parameters such as those relating to the temperature, humidity, ventilation rate and presence of contaminant*"

[4] in the EPBD 2024 via Article 7 and 8 respectively, Member States shall address, in the case of for new constructions and major renovations, the issues of indoor environmental quality, adaptation to climate change, fire safety, risks related to intense seismic activity, the removal of hazardous substances including asbestos and accessibility for persons with disabilities.

[5] i.e. single-parent households, young people, racialised people, elderly people, people with disabilities, etc.

[6] https://publications.jrc.ec.europa.eu/repository/handle/JRC136870

[7] https://ec.europa.eu/commission/presscorner/detail/en/ip_24_1965

[8] https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20250123-2

[9] Europe is the fastest warming continent, and it is predicted that the number of Europeans exposed to extreme heat will increase from 10 million to 100 million by 2100

[10] https://cooltorise.eu/

[11] Improving energy efficiency via insulation, coupled with the uptake of renewable heating solutions will lead to significant energy savings and emission reductions. Facilitating the smart integration of buildings in the energy system can transform them into an active contributor of energy security by addressing the balancing needs of the grids.

- As far as the EED is concerned, it will be important that its implementation leads to reaching and ideally overshooting the EU 2030 energy efficiency target, including through the roll out of measures for building renovation and those that benefit people affected by energy poverty. Particularly important here is the "exemplary role of public bodies"[12] and their annual renovation target of at least 3%. **Ensuring that public bodies deliver (and have the necessary capacity to deliver) on this target and surpass it**, by for instance limiting loopholes, via encouraging Member States to not make use of the new alternative approach and limiting exemptions for renovations of historic, armed forces and religious buildings and social housing, will be of great importance.

  Next to this, the public sector obligation[13] to reduce final energy consumption of public bodies by at least 1.9 % should be mentioned, which should include energy efficiency measures that do not have adverse effects on energy poor, low-income households or vulnerable groups. The new EED also puts forward other important requirements which need to be correctly implemented and improved as they will empower vulnerable consumers, energy poor and people living in social housing[14]. The Directive requires Member States to plan and implement new policy measures and programs that will achieve more energy savings among final consumers to comply with the increased annual energy savings rate of the energy savings obligation[15], where a percentage of energy savings will have to be earmarked amongst people affected by energy poverty, vulnerable customers, people in low-income households and, where applicable, people living in social housing.

- As for the EPBD, particularly important on the side of ensuring the residential sector becomes more adequate, the recast Directive offers a rather flexible approach[16] that particularly focuses on the leakiest buildings (also known as "worst-performing buildings"). Member States are in fact required to ensure that renovations contribute to a progressive improvement of the average energy performance level of the whole residential sector, leading towards the fulfilment of the climate neutrality target in 2050 for buildings. Within this context, **supporting the roll out of regulatory tools such as Minimum Energy Performance Standards (MEPS), which are coupled with adequate financing and technical assistance, can signal the needed energy renovations, especially for worst-performing buildings**[17] and ultimately ensure the delivery of well performing, decarbonised and affordable homes for all.
  - To unlock their full potential, MEPS should make use of strategic trigger points and focus on specific segments[18], and being coupled by **strong social safeguards.** The latter **is another crucial element in support of renovations that improve the quality, affordability and availability of housing**. Social safeguards are already mentioned in 2024 EPBD recast[19], which calls Member States to address eviction of vulnerable households, which may be caused by disproportionate rent increases following renovations, and/or introduce effective safeguards to protect in particular vulnerable households, and provide rent support or impose caps on rent increases (see examples below), among other measures. **Within the context of the upcoming European Affordable Housing Plan, the latter should also be strongly promoted and their design supported**.

National example: France

The city of Paris has been piloting a rent control system since 2019, which acts together with a yearly decree that limits the annual increase of rents upon rental agreement renewal (IRL). According to the

[12] Article 6 EED 2023
[13] Article 5 EED 2023
[14] Article 24 EED 2023
[15] Article 8 EED 2023
[16] Article 9 and the "trajectory approach for residential buildings" which requires Member States to reduce the average energy consumption of their residential stock by 16% by 2030 and by 22% by 2035 with a focus on renovating the worst-performing buildings (55% of savings must come from the renovation of this segment)
[17] A Eurofound study showed that renovating the 10% worst-performing dwellings across the EU to have the highest potential for cost savings for the healthcare system: for every 3 euros invested in addressing housing hazards, 2 euros are saved in healthcare expenses every year due to improved housing conditions - a one and half years payback time
[18] single-family homes and/or multi-apartment buildings in single-ownership
[19] Article 17 EPBD 2024

first estimates, over the period from July 1, 2019 to July 1, 2023, the rent control led to a decrease in Parisian rents of -4.2% compared to what would have been the situation without rent control[20].

National example: Belgium

In October 2022, the Flanders Region implemented a one year rent indexation stop for the worst performing dwellings. In practice, it meant that for housing with an Energy Performance Certificate (EPC) D the indexation was capped at half of the allowed rate and that for dwellings with an EPC E or F indexation, it was simply halted. The measure led to an increased number of renovations according to the Flemish Rent Platform[21].

Increasing affordability of housing by upscaling (deep) energy renovations

As mentioned above, and as recent research shows[22] households strongly link energy costs to housing cost burdens. This means that the energy performance of homes have direct repercussions on the level of affordability of households' housing costs. Increasing (deep) renovations rates and improving their accessibility, especially for the most vulnerable and energy poor, can reduce overall stress on households' budgets. Although due to their high upfront costs, these are often not accessible to the ones most in need. The European Affordable Housing Plan should therefore leverage the **upcoming revision of the next Multiannual financial framework (MFF) to create the foundation of a strong enabling framework that can support Member States in rolling out more and deeper energy renovations on the ground.**

In view of the existing investment gap[23] to decarbonise our building stock, Cohesion Funds must be better used and channelled towards building decarbonisation purposes, and ultimately increased within the context of the post-2027 MFF. By strengthening the environmental and social conditionalities for EU funds disbursement, and by gearing up national authorities with the needed technical assistance, which can help them strategically channel funds to support projects and programmes that tackle the decarbonisation of buildings (with a view to alleviate the current housing crisis), we will be able to support the needed upscaling of deep renovation rates, and those construction activities that are dedicated to the supply of the needed affordable housing. Technical assistance will also help Member States in better earmarking funding to prioritise the most vulnerable segments of the society and worst-performing buildings. Exchange of best practices across EU countries can help national policy makers and managing authorities in this regard. Managing authorities should also be encouraged to allocate a sufficient share of the renovation budgets to administrative capacity, technical assistance and other priorities such as workforce training (i.e. in municipalities and other entities) that can further support the absorption of funds on the ground and ultimately the proliferation of renovation projects.

Ensuring affordability of housing will also link with a successful roll out of the new Emissions Trading System covering GHG emissions of buildings and road transport (EU ETS-2), which will kick off in 2027. The latter will likely increase the energy bills of households, especially those living in very leaky and polluting homes. The creation of the Social Climate Fund (SCF), which aims at mitigating the effects of the ETS-2 on the poorest households, is positive, but not enough for the challenges we will be facing. Therefore, ensuring that National Building Renovation Plans (NBRPs) are interconnected and complementary with the National Social Climate Plans (NSCPs) can help redirect the funds where they are most needed in the building sector, and advance a socially fair and climate ambitious energy transition in the sector[24]. **The European Affordable Housing Plan should therefore provide support to Member States in leveraging the link between NSCPs and NBRPs to ultimately deliver a more coordinated, climate ambitious and socially just approach in decarbonising homes.**

[20] https://www.apur.org/sites/default/files/rapport_encadrement_loyers_paris.pdf?token=PjiUiVDg
[21] https://huurdersplatform.be/vhp/
[22] https://dpsa.dk/papers/DPSA_draft.pdf
[23] 275bn EUR per year
[24] https://caneurope.org/renovation-wave-nbrps/

As part of this work, **support in the design of innovative financial incentives and programmes that are better targeted should be included in the work of the European Affordable Housing Plan**. A better prioritisation of public funds (and earmark of those) for the least well-off, and promotion of innovative ways to leverage a portion of public funds to increase accessibility levels of private financial products for households which are not in situations of severe vulnerability needs to be taken into consideration (especially in the context of the pan-European Investment Platform). This would allow for more efficient use of public funds, enabling Member States to focus them to a greater extent to those segments of the population that have no capacity to renovate their homes, while de-risking and increasing accessibility levels of private investments for families with increased financial capacity.

Promotion of **pay-as-you save schemes** for instance, can be helpful to help households in situations of non-severe vulnerability to renovate their homes. **Recurring funds**[25] could also be an option as these consist of renovation subsidies given to households to renovate their home, which have to be paid back when the property changes ownership[26], recovering the investment made by the administration. This model can be useful to make renovation programmes more viable in the long-term. Another possible example can be **Energy Savings Certificates**, which are based on the energy efficiency obligations imposed by the public authorities on Obligated Parties. These are electronic documents that guarantee that, after carrying out an energy efficiency improvement, a new final energy saving equivalent to 1 kWh per certificate has been achieved, which can be bought. Lastly, **increasing the floor area of buildings in low-density areas**[27] could provide economic benefits that could be used to cover the renovation work carried out. These additional volumes could be located next to or on top of existing buildings, depending on the building typologies and the urban environment.

Optimising the housing supply: innovative and inclusive approaches and smart urban planning

While it is crucial to recognise the importance of new sustainable construction in the provision of affordable housing, increasing the housing supply should generally follow the actual housing needs rather than the housing demand, as the latter could potentially lead to speculation practices and increased prices, especially in high population density areas. In order to avoid 'boom and bust' cycles in the EU housing market, focussing on the delivery of the needed housing supply (where new constructions shall fulfil the requirements set by EU legislations[28]), with special emphasis on the supply of social housing will be a crucial task for the European Affordable Housing Plan. Within this context, **this initiative should also look into approaches that prioritise as much as possible the optimisation of existing spaces, especially those unused to address further inefficiencies of our housing stock and ultimately boost availability and accessibility of housing**.

According to Ramboll and Buildings Performance Institute Europe[29], renovating and/or repurposing empty spaces or existing buildings has a double objective: if on one hand it helps reduce the lifecycle carbon emissions of buildings (which is very important from a material efficiency perspective), it can also avoid urban sprawl while supporting the delivery of affordable housing, regenerate urban settings and foster community development. In fact, **optimising the way our existing stock is used** (and ultimately improving it, instead of directly building new) **can emphasise the potential of purposefully redistributing, leveraging and managing existing built spaces as a valuable resource**. Implementation of policies in favour of these approaches needs significant administrative capacity, financial support, removal of existing

[25] The Flanders region developed the 'Rental and insulation premium' for dwellings inhabited by vulnerable private tenants, which is a collective that is rarely covered by energy poverty programmes. In addition to a flat-rate contribution of 200€, the owner receives 20€/m² for roof insulation; 12€/m² for wall insulation; 85€/m² for high efficiency windows. In addition, an emergency fund was set up for certain target groups who do not have sufficient financial resources to carry out energy efficiency renovations. An interest-free loan of up to 25,000€ can be granted to the emergency buyers, poor owners who are required to purchase a poor quality dwelling. Only when the home is disposed of, or at the latest after 20 years, the loan must be reimbursed.
[26] See the French case of "Prêt Avance Rénovation": https://www.ecologie.gouv.fr/politiques-publiques/pret-avance-renovation
[27] The ABRACADABRA project focuses on the creation of a substantial increase of the real estate value of the existing buildings through a significant energy and architectural transformation. The project proposes volume add-ons that can be included in different positions of the renovated building (top, aside, façade, ground floor or as an assistant building) and can increase the value of the whole building which can be leveraged to finance the renovation.
[28] EPBD 2024, Article 7 "New Buildings"
[29] https://op.europa.eu/en/publication-detail/-/publication/da276a27-b2b7-11ef-acb1-01aa75ed71a1/language-en

counter-incentives, improvement of research tools, consistent access to reliable data and clearer definitions to create scalable, tailored solutions for diverse building contexts. The European Affordable Housing Plan offers a unique opportunity to promote and scale up innovative and inclusive approaches that unlock the multiple benefits of making full use of the existing building stock.

Firstly, a robust data and monitoring framework should be established to create a common language around vacancy, under-occupation, and conversion potential. **Building on existing reporting obligations under the EPBD (such as those related to the energy performance and typology of national building stocks in the NBRPs) Member States should also be required to monitor and publicly report on actual building usage.** This should include identifying and distinguishing between buildings that are vacant or underused and could be repurposed for housing, and those more appropriate for other economic, commercial, or social functions. EU support should accompany this effort, including technical assistance to local administrations to enhance data collection and analysis.

Secondly, public ownership should be leveraged more strategically. **Building on the exemplary role of public bodies' buildings of the Energy Efficiency Directive (EED), the European Affordable Housing Plan should encourage Member States to develop a Public Exemplarity Framework aimed at identifying and repurposing vacant and underused public buildings for affordable, energy-efficient housing. To support this, the Plan should provide clear EU-level guidance and tools to help national and local authorities design and implement such frameworks effectively.**

Thirdly, action in the private ownership domain should be incentivised through targeted financial mechanisms. **Leveraging private investments using the pan-European investment platform for affordable and sustainable housing could support the renovation and repurposing of vacant private properties for housing, contingent on affordability and sustainability outcomes.** Regional hubs connecting municipalities, cooperatives, social enterprises, and financial institutions should also be established to enable and support these private-sector conversions.

In addition, **if renovation projects are carried out as part of integrated regeneration projects at district/neighbourhood level, this can unleash multiple benefits for people and local communities**. Integrated district/renovation approaches could be an approach that the European Affordable Housing Plan should develop and support in the context of the current energy prices, housing and climate crisis. Strategic urban planning that takes into account the integration of collective renewable heating solutions (i.e. district heating), climate adaptation needs (i.e. passive cooling strategies to tackle cities' heat islands), land protection, energy system efficiency and socio-economic priorities (i.e. prioritising the needs of those most in need) have the potential to deliver resilient and accessible housing for all.

National example: Germany

The example of the Brühl district in Chemnitz[30], Germany, shows how an integrated urban renewal and energy transition approach can transform a neglected area into a vibrant, energy-efficient, and socially revitalised neighbourhood: between 2012 and 2022, 90% of buildings were renovated, vacancy dropped from 90% to 10%, and a local low-temperature heating network powered primarily by solar energy was deployed, all while enhancing cultural and educational infrastructures[31].

In order to roll out and upscale such innovative and inclusive approaches, the **European Affordable Housing Plan should explore ways to foster dialogue and facilitate multi-level governance for more effective implementation**. This could be done via establishing ad hoc observatories (at local and regional level) to monitor adequate and affordable housing needs and renovation activities, especially in congested housing areas, and/or building upon existing structures (i.e. one-stop shops, ad hoc hubs etc.) that can support the acceleration of renovations and access to housing in a coordinated way.

[30] https://forumpourlavenir.eu/initiatives/chemnitz
[31] Further examples of such integrated and people-centred approaches to building decarbonisation can be found in the repository of inspiring stories collected under the Build Better Lives campaign.

Enhancing stakeholder engagement such as NGOs, industry and social partners and public participation (in the context of NBRPs and other fora) can lead to solutions addressing common challenges that are widely supported and improve the decision making process. Cities are the closest form of government to the residents and therefore have a unique knowledge about the local needs and challenges, including related to renovations, housing etc. They can rally local stakeholders to foster cooperation and dialogue, focusing on more tailored made solutions. Therefore they always need to be consulted and involved in decision making processes and the development of plans and policies at national and at EU level. Increasing multi-level governance can lead to more inclusive planning, spearhead action and buy-in for policies and measures that aim at alleviating the housing crisis, while advancing our energy transition agenda.

Lastly, it is important to note that investing in the renovation sector has potential in supporting the EU competitiveness agenda. The sector is already a large contributor to the EU economy with its yearly turnover of around €850bn and 6.5 million workers[32]. By ensuring a strong regulatory framework, the renovation/construction sector is provided with the needed long term market visibility to plan investments, hire and train workers to face the increasing demand for renovations.
Linked to this, **it will be paramount that the European Affordable Housing Plan (especially in the context of a Housing Construction Strategy) ensures that increasing demand for renovation and construction of needed affordable housing does not come at the expenses of delivering high quality, safe and attractive jobs in the sector.** This will notably require that any public support to private companies (whether through state aid or EU funds) should be tied to strict social conditionalities, whose respect should be monitored and sanctioned in case of non-compliance[33]. In addition, open dialogue and continued partnership with trade unions, social partners, and civil society organisations needs to take place at all levels to deliver needed jobs with decent working conditions, skilling and upskilling of construction workers, and supporting unionisation, protection and inclusivity for new jobs. The European Affordable Housing Plan should maximise the social potential of the transition of the built environment.

[32] Navigant, 2019 “Comprehensive study of building energy renovation activities and the uptake of nearly zero-energy buildings in the EU
[33] https://caneurope.org/public-money-public-benefits-call-for-social-and-environmental-conditions/

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