

To: Ms Ursula von der Leyen, President of the European Commission
Cc: Mr Peter Van Kemseke, European Green Deal Adviser to the European Commission President
Ms Ruth Reichstein, Policy Coordinator in the Cabinet of the European Commission President
Mr Stefan Moser, Head of Unit (DG ENER B.3)
Ms Katharina Knapton-Vierlich, Head of Unit (DG GROW.H.1)

Brussels, 06 September 2024

Subject: Joint cross-sector recommendations on the first European Affordable Housing Plan

Dear President von der Leyen,

We, the undersigned organisations, fully support your initiative to propose the first-ever European Affordable Housing Plan (EAHP) and appoint a commissioner whose responsibilities include housing. Your proposal offers a unique opportunity to incentivise the EU-economy whilst addressing both the climate and social crises that the EU is currently facing.

To be effective, the design and actions developed under the European Affordable Housing Plan need to be coherent and consistent with the existing legislative acquis regarding energy, climate, and sustainable construction. This will require engagement across multiple Commissioner portfolios, with Member States' authorities, and with the housing and construction (products) sector.

The European Affordable Housing Plan must strike the right balance between fostering the construction of new affordable, energy efficient, sustainable housing and incentivising the much-needed renovation of existing ones. The latter is key to lower energy bills, which are often associated with the overall cost of housing. Renovating the approximately 210 million existing buildings in the EU is essential from a socio-economic, climate and EU-competitiveness perspective and must not be missed out.

High-performance, low- or zero-emission buildings, both old and new, will enable a higher penetration of variable renewable energy sources and opportunities for demand-side flexibility. Better housing will ensure that residents will be less vulnerable to extreme temperature variations, which strain budgets and harm health and comfort, while a greater share of renewable electricity can be directed to hard-to-abate energy-intensive sectors, creating synergies that benefit society at large.

As you rightly state, the housing environment is very often shaped by local conditions, therefore the financing and state aid rules mechanisms of the future EAHP must fully consider the full implementation of the many buildings related regulatory parts of the Green Deal and the Fit-for-55 package such as the amended Energy Efficiency Directive (EED), the Energy Performance of Buildings Directive (EPBD), the Renewable Energy Directive (RED) and the Construction Products Regulation (CPR). In this way, the Plan can revitalise the Renovation Wave and unlock the necessary investments to achieve its goals.

We, the signatories of this letter, are your partners in this important and timely initiative. Together we can ensure, among other factors, that the upcoming Multiannual Financial Framework (MFF) funds dedicated to housing, construction, and renovation are fully used by the member states. We also need

to work together on guaranteeing that the EAHP will encourage and assist managing authorities to fully utilise their current MFF and Recovery and Resilience Fund (RRF) budgets.

Furthermore, enhancing technical assistance to improve the absorption of RRF and MFF financing for renovations, including guidelines for Member States to allocate minimum percentages of housing budgets to administrative capacity and workforce training is key. This should be coupled with the development of public-private partnerships with the state authorities to blend financial solutions and deliver energy efficiency renovation works at district and neighbourhood levels.

In parallel, it is essential to direct the Social Climate Fund and other ETS 2 revenues towards assisting low-income households with renovations, providing long-lasting solutions and protecting them from potential negative externalities of the trading system and ensure right sequencing in worst performing buildings. This should be further supported by agreeing long-lasting and bold VAT rules that support renovation works, renovation materials, and new build activities.

Additionally, we urge the Commission to push for increased protection for renters, especially when public funds are used for renovations. Furthermore, it is important to advise Member States to set minimum standards for energy efficiency and indoor air quality in rental homes to ensure that renters have access to decent living conditions.

To conclude, we believe that addressing the root causes of the housing-related social and economic issues can, and must, go hand-in-hand with the EU's emission reduction goals. The European Affordable Housing Plan has the potential to ensure that no one is left without a home or trapped in a bad house, which could burden them with higher bills, and poor health and comfort conditions for decades to come.

Therefore, we are ready to provide you and the future designated Commissioner with further support and suggestions on this highly relevant matter.

Yours sincerely,

European Association for External Thermal Insulation Composite Systems



EAE represents more than 80 per cent of Europe's revenue from ETICS, covering the entire ETICS value chain. Our main objectives are to communicate the multiple benefits of using ETICS, to improve the energy efficiency of Europe's huge building stock, and to work towards a "culture of sustainability" in the construction sector via the safe and durable use of ETICS.

Efficient Buildings Europe



Efficient Buildings Europe is the leading European industry association, dedicated to advancing energy efficiency in European buildings. We collaborate closely with stakeholders to shape the future of energy efficiency and drive the transition towards zero emission buildings. Our members are industry leaders specialising in a diverse array of energy efficient solutions that enhance the performance of buildings throughout the entire value chain.

European Building Automation and Controls Association



eu.bac is the European Building Automation and Controls Association. It represents the major European manufacturers of products and systems for home and building automation. Its vision is a world where everyone lives in buildings that are smart, decarbonised, and efficient.

European Trade Association of PVC Window System Suppliers



The European Trade Association of PVC Window System Suppliers EPPA represents the manufacturers of PVC window systems and related building products in Europe. About 25,000 employees process about 1, 4 million tons of PVC creating a turnover of €4 billion with profile systems and building products. Based in Brussels, EPPA provides a common platform for bundling national activities in the fields of PVC window technology, recycling, environment and public affairs.

European Insulation Manufacturers Association



Established in 1959 to create a favourable business environment for mineral wool insulation and promote improved standards for insulation materials, Eurima is a research-driven organisation whose industry members produce a wide range of mineral wool products for thermal and acoustic insulation, providing fire protection of domestic and commercial buildings and industrial facilities while offering innovative growing media and green-roofing solutions.

European Federation of National Associations of Gypsum Product Manufacturers



Eurogypsum is a European federation of national associations of producers of gypsum products (i.e. plaster and plasterboard). It is one of the few fully integrated industries (from cradle to cradle) within the construction products field. The companies which extract gypsum also process it and manufacture the value-added products and systems used extensively in construction and other industries.

Europe's Flat Glass Sector Trade Association



Glass for Europe is the trade association for Europe's flat glass sector. Flat glass is the material that goes into a variety of end products, primarily in windows and facades for buildings, windscreens and windows for automotive and transport as well as solar energy equipment, furniture and appliances. Glass for Europe brings together multinational firms and thousands of SMEs across Europe, to represent the entire building glass value-chain.

The European Federation of Public, Cooperative and Social Housing



Housing Europe is the European Federation of Public, Cooperative & Social Housing. Since 1988 it is a network of 45 national and regional federations, as well as 16 partnering organisations in 31 countries in Europe. Together they manage around 25 million homes, about 11% of existing dwellings in Europe.

Federation of European Rigid Polyurethane Foam Associations



PU Europe is the European voice of the polyurethane (PUR / PIR) insulation industry. Our mission is to demonstrate the benefits and support the introduction of low energy building solutions for new constructions and renovation projects across Europe and develop sustainable and cost-efficient solutions using PUR/PIR high performance insulation to support the societal shift towards the 2050 goal.