

Response to the call for evidence

Housing: A simplification that works for consumers

Why it matters to consumers

Housing has become one of the top concerns for European consumers, and for good reason: decent, safe and affordable homes are increasingly out of reach. The issue is straightforward: supply of this kind of housing is failing to meet demand. Several avenues exist to speed up procedures, notably stepping up the renovation rates. However, faster delivery cannot come at the expense of consumer protection.

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The European Consumer Organisation ([BEUC](https://www.beuc.eu)) is the largest organisation promoting the general interests of Europe's consumers. Founded in 1962, it proudly represents more than 40 independent national consumer organisations from over 30 European countries. Together with [our members](#), we inform EU policies to improve people's lives in a sustainable and fair economy and society.

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Introduction

Housing has become European consumers' top concern as finding a decent, safe and affordable home has become increasingly difficult.

First, households are struggling to find something they can actually afford, as purchase prices and rents are rising faster than incomes. Second, even when a home is found, families must ensure it does not turn into a financial black hole, as energy bills and maintenance costs are exploding and eating into households' budgets. Finally, and especially for vulnerable households, beyond up-front and energy costs, the very quality of the dwelling matters. Many homes across Europe remain poorly insulated and of inadequate quality. This burden falls disproportionately on vulnerable households: in 2023, 23.5% of people living below the poverty line lived in homes affected by problems such as leaking roofs, damp walls, floors or foundations, or rot.

This housing affordability crisis is due to a number of reasons such as increasing urbanisation, the rise of single-person households, construction sector difficulties, lengthier permitting procedures and the financialisation of the housing sector. Regarding the latter, market players progressively transformed housing, a basic necessity, into a financial asset and a source of investment returns. The acquisition of residential properties by institutional investors, real estate funds, and large-scale landlords contributed to rising property prices and rents. At the same time, the expansion of short-term rentals removes part of the housing stock from the long-term residential market, particularly in major cities and tourist destinations. To address the housing crisis, this issue should be addressed at EU level. That is one of the reasons why we welcomed the recent publication of the Affordable Housing Act

At this stage, the precise scope of the package remains uncertain. In the absence of further clarity, BEUC sets out below the principles that should guide the Commission's work, as well as the red lines that must not be crossed.

1. Simplifying procedures while protecting consumers' rights

BEUC shares the Commission's assessment that the scale of this crisis calls for decisive action, including an honest review of where rules create unnecessary constraints.

This simplification exercise should not, however, become a deregulatory agenda and a goal in itself. At EU level, legislation has too often been associated as burdensome, unnecessary or even illegitimate (e.g. 'gold-plating'). Simplification likewise is framed by some as necessary for making business easier and faster in Europe, whereas the need to make life easier and better for people is neglected. This simplification exercise must avoid this misguided notion of EU legislation. The focus needs instead to be on delivering fast and visible improvements for people and ultimately for a more prosperous, decarbonised and resilient EU.

Another important point is that simplification and good policymaking must involve those affected by the decisions. Some of the Commission's simplification efforts to date have not adequately reflected the better-law making principles and legal certainty. We therefore call on the Commission to follow efficient, open and transparent procedures in the context of the Housing Simplification Package. This proposal needs to respect the Better Regulation approach including the 'evaluate first' principle. Any proposal that entails a policy choice by the Commission should also be accompanied by an impact assessment to enable those affected to scrutinise – and where necessary challenge – the basis for the chosen policy option.

2. Housing affordability also depends on affordable energy bills

The affordable housing crisis is also an energy crisis. The current cost-of-living crisis was in large part driven by soaring energy prices, which hit low-income households hardest as they devote a large share of their budgets to essential energy services. In 2022, low-income households across Europe spent an average of 7.5% of their budgets on energy, with this figure rising above 10% in some Member States. As energy costs continue to rise and homes are not energy efficient, this forced families to choose between heating their homes, having decent housing, and living in a healthy environment.

One way therefore to address housing affordability is to also address energy costs. This is best done by accelerating the decarbonisation of our society. A clear takeaway from the current Middle East crisis is that investment in renewables, clean technology (such as

affordable heat pumps and electric mobility) and moving away from fossil fuels is the best way to achieve energy independence and affordable energy prices in the long run.

Recommendations

Housing affordability should encompass energy costs. To decrease these, the Commission and Member States should:

- Double down on the deployment of renewable energy, clean energy tech and energy efficiency measures, standing firmly by the ambition of recently adopted legislation.
- Apply the principle of energy efficiency, by prioritising measures that reduce energy demand before considering additional energy supply.

3. BEUC's red lines on the Housing simplification package

As developed in Section 4, BEUC recognises that some administrative procedures around construction, and especially renovation, can and should be simplified. But simplification cannot happen at the expense of consumer protection. Existing timelines, controls and requirements serve essential functions: they ensure the quality of works, the actual performance of renovations, and the safety of occupants.

Recommendations

The Commission should not reopen the substantive protections secured under the Green Deal, including:

- **Energy performance requirement:** As set out below (see Section 4), the housing crisis is also an energy crisis. Rolling back energy efficiency achievements would weaken consumer protection, for vulnerable consumers most of all, and undermine Europe's energy resilience. The Energy Efficiency Directive and Energy Performance of Buildings Directive were adopted during the last mandate and have not been fully implemented yet. Even if the transposition deadline has passed for both Directives, Member States have been late with implementation. This is especially relevant in the case of the EPBD. The Commission should therefore prioritise support to the Member States in their implementation of these two Directives.

- **Protection of vulnerable consumers.** The European Commission must not weaken protection for vulnerable consumers, who need the greatest protection in the current housing crisis. No weakening of requirements applicable to social housing or to the energy performance of public buildings can be accepted. Lowering these standards would widen, rather than narrow, the gap between low-income households and the rest of the population.
- **Building safety, accessibility and quality standards.** Construction safety, accessibility and quality rules exist to protect consumers. Any loosening would increase the risk of fire, product intoxication, domestic accidents, etc., with direct consequences for occupants' health and safety.
- **Health and sanitary standards.** Many health problems are linked to poor ventilation, inadequate indoor temperature and insufficient insulation. These standards should be strengthened, not loosened, as part of any simplification effort.
- **Biodiversity and climate risk safeguards.** Rules limiting construction in protected areas or in zones exposed to climate-related risks are designed to reduce consumers' and communities' exposure to those risks. They must be fully maintained.

4. Where genuine simplification is needed: making energy-efficiency accessible for consumers

If simplification is to deliver real value anywhere in this package, it's by making energy efficiency accessible and addressing the slow pace of renovations.

Consumers still face genuinely complex, fragmented and inconsistent procedures when they try to renovate their home, electrify their heating, or otherwise improve its energy performance.

This is not a peripheral issue. Research from the Joint Research Centre concluded that the EU would need more than two million additional dwellings per year by 2035 to meet demand. The potential of the existing stock could be unlocked by renovating dwellings, which would also reduce costs for households (energy, maintenance...). Nearly 80% of Europe's current buildings will still be in use in 2050, meaning most households will continue to live in existing dwellings for decades. Yet nearly 75% of this housing stock is energy inefficient, and the EU renovates only about 1% of its housing stock per year.

4.1. Guide consumers through independent and tailored solutions

Renovation is often complex and discouraging for consumers. Without clear guidance, many make poor decisions or abandon their project altogether. There is no one-size-fits-all solution: the right approach depends on the dwelling, and consumers need personalised, independent and trustworthy advice. They need to understand what to prioritise, when, and in what order.

One-stop shops have an essential role to play in bringing information, technical assistance and financing together in a single place. They are an on-the-ground solution to simplify procedures for consumers.

To be effective, they must be genuinely accessible, not only online but in person to bridge the digital divide and build trust with households facing complex individual situations. In addition, their advice must be fully independent and strictly aligned with households' interests.

Critically, these services need to be properly funded, potentially through revenues generated by the ETS2 emissions trading system, so that they can recruit enough staff and maintain a high standard of support.

4.2. Tackle the up-front cost barrier

Energy efficiency works are often slowed down by their financial inaccessibility for consumers. Yet the high up-front cost of renovation remains a major obstacle, and even where public support exists, it often only reimburses expenses after they have been incurred.

Low- and middle-income households can rarely pre-finance this gap and as a result, many delay or abandon renovation works altogether. Consumers, and vulnerable consumers in particular, should not bear the financial burden of the energy transition alone. Effective public guarantees and adapted financing mechanisms, involving the state and the private sector are essential to allow all households to undertake energy efficiency works without facing prohibitive up-front costs.

BEUC has recently published a dedicated [paper](#) setting out possible solutions on this issue.

4.3. Strengthening consumer trust

Renovation at scale depends on trust. Where consumers hesitate to commit, unsure whether promised savings and comfort gains will materialise, renovation rates stall. Where trust is misplaced, disputes follow the fact.

Energy Performance Certificates (EPCs) are a valuable tool for informing consumers about their home's energy performance, but they must become more accurate and consistent, and better reflect practical dimensions of everyday comfort and health. EPCs need also to properly account for real-world weather conditions, including heatwaves.

Recent assessments show that EPCs still lack sufficient reliability in practice: for the same dwelling, ratings can differ by up to four classes depending on the assessor, which severely undermines trust in the system and its capacity to drive investments.

Finally, the fragmentation of national EPC schemes across Europe creates clear inequalities between citizens as methodologies, thresholds, and even certificate structures still vary widely from one Member State to another.

4.4. Develop a skilled workforce

In order to motivate consumers to decarbonise their home, it is also essential to guarantee the quality of renovation works. Furthermore, an estimated [35 million buildings](#) across the EU will need to undergo energy renovation by 2030. Yet the qualified workforce required to deliver this transformation is already falling short.

This skills gap has direct consequences on consumers. Households will only commit to renovation if they trust the work will be done well. Scaling that up will also ensure less litigation between consumers and companies, accelerating processes.

To reach that goal, a major investment in training and up-skilling of the construction workforce is needed. In addition, a mechanism that helps consumers identify trustworthy contractors, for instance through one-stop shops, would help speed up procedures.

4.5. Extend protection to tenants, not only owners

The ease of improving energy efficiency varies according to whether consumers are owners or tenants. Around one third of Europeans rent their homes, meaning renovation policy cannot operate on a two-speed model that protects owners while neglecting those living in rented housing.

Renovating a home should be as simple for both tenants and homeowners. That is why tenant protection is essential to guarantee access to decent, affordable and energy-efficient housing, without turning renovation into a source of inequality.

A key priority is tackling “renoviction”, a situation whereby landlords use renovation works as a pretext to evict tenants and then relet the property at a higher rent. This practice disproportionately affects low-income households and accelerates the gentrification of cities.

Energy renovation also generates savings that must benefit tenants, not only owners. Without safeguards, the split-incentive problem persists: owners capture the subsidies and increase in property value, while tenants bear the higher cost of housing.

Recommendations

To accelerate renovation and increase the supply of affordable housing, the European Commission should make sure that:

- **One-stop shop advice is accessible to all households**, sustainably funded, and delivered by structures independent of commercial interests to guarantee impartial and high-quality standards.
- **Financing instruments are calibrated to make the energy transition affordable** for all consumers, particularly the most vulnerable.
- **Trust is restored in Energy Performance Certificates (EPCs)**. This requires more reliable methodologies that reflect real-world conditions, including summer as well as winter performance, harmonised standards across the EU, and regular assessment of the scheme's relevance and effectiveness.
- **Scaling up renovation at pace** requires sustained investment in training and up-skilling for sector professionals, alongside mechanisms that make it easy for consumers to identify qualified tradespeople.
- **Protect and support tenants in renovating their homes** too, including shielding households from abusive practices such as “renovictions” ensuring tenants have effective access to renovation, and addressing the problem of split incentives between landlords and tenants.