

FEANTSA's Response to the EU Anti-Poverty Package

FEANTSA took note of the launch of the Anti-Poverty Package by the European Commission on 6 May.

Introduction

FEANTSA welcomes the European Commission's initiative to launch a major new strategy on poverty, particularly in light of the limited progress towards achieving the EU's poverty reduction targets. We appreciate the Commission's use of its right of initiative to help advance this important agenda.

At the same time, we recognise that poverty falls within an area of shared competence between the EU and its Member States. The EU's added value lies primarily in coordinating, guiding, and supporting national efforts. In this context, while it may be unrealistic to expect the Commission to deliver a fully comprehensive plan to prevent and address poverty across Europe, it is entirely appropriate for it to develop a roadmap and propose EU-level actions to steer and reinforce Member States' responses.

Our initial assessment of the Anti-Poverty Strategy identifies several positive and useful elements, particularly with regard to measures addressing homelessness. However, we also note that certain opportunities have been missed, and some proposed actions appear to offer limited added value at the European level. This assessment is explained below, where we present comments on the overall package, followed by detailed comments on the Communication.

Comments on the Overall Package

The Anti-Poverty Strategy takes the form of a package containing several elements: a Communication on the Strategy, a Staff Working Document on Poverty on the EU, a Staff Working Document on Principals for Effective Anti-Poverty Policies, a Communication on a Strengthened EU Child Guarantee, a Commission Staff Working Document on progress made in the implementation of the current Child Guarantee, and a Proposal for a Council Recommendation on Fighting Housing Exclusion.

FEANTSA welcomes the fact that the fight against homelessness is identified as a key priority within the Package, notably through the proposal for a Council Recommendation on Fighting Housing Exclusion, which constitutes the only legal initiative within the Package. As the Recommendation is essentially focused on tackling and preventing homelessness, it would have been appropriate to explicitly refer to homelessness in its title. See FEANTSA's [detailed position on the Recommendation](#).

It is positive that homelessness is acknowledged in the main Communication on the Anti-Poverty Strategy. The fact that more than one million people experience sheltered or unsheltered homelessness on any given day in the EU is indeed alarming. However, it is regrettable that the Communication does not include a concrete set of actions at the EU level to support Member States to better prevent and address homelessness. Instead, it simply refers to the proposed Council Recommendation on Fighting Housing Exclusion, which may serve as an important foundation for future action if adopted. It would have been helpful if the Commission had set out some forthcoming EU-level actions to support Member States in making tangible progress on homelessness.

It is particularly concerning that the EU Platform on Combatting Homelessness (EPOCH), launched in 2021 as the central instrument for EU action on homelessness, is not mentioned. This omission is notable given that the Platform requires further development and reinforcement if Member States are to make meaningful progress towards the objectives set out in the Recommendation. After five years of EPOCH's operation, it appears unnecessary to postpone detailing its future activities until the proposed Recommendation is adopted. On the contrary, advancing such details now could have helped accelerate implementation and demonstrated a stronger commitment to the EU's coordinating and supporting role.

The Commission Communication on strengthening the European Child Guarantee, is welcome. However, it addresses the growing issue of child homelessness only by referring to the proposed Council Recommendation on Housing Exclusion. Child homelessness should be explicitly prioritised within EU policies related to the Child Guarantee itself. This is especially pressing given that the Commission's Staff Working Document underpinning the Communication indicates that none of the 27 Member States adequately implement provisions related to child homelessness under the Child Guarantee Recommendation, with 17 countries performing poorly or very poorly.

The Commission Staff Working Document (CSWD), providing guidance for effective anti-poverty strategies, is a useful tool that supports the interpretation of the Package. FEANTSA particularly welcomes its explicit condemnation of the criminalisation and penalisation of homeless people — an increasingly concerning trend in several Member States — which is notably absent from the Council Recommendation on Housing Exclusion. The CSWD's recognition of the need for distinct, dedicated homelessness strategies at different policy-making levels is also positive, especially given that many Member States have already developed or are in the process of developing such strategies. It is also encouraging that the document emphasises the importance of housing-led and person-centered approaches to homelessness.

The CSWD on trends and policies provides helpful context for understanding the broader framework in which the Anti-Poverty Package has been proposed and how EU action can contribute meaningfully. However, it is regrettable that the Commission does not apply a clear and consistent definition of homelessness, which is essential for understanding differences within and between Member States. Additionally, the document draws conclusions about the causes and solutions to homelessness based on Eurostat data on lifetime experiences of homelessness, which are insufficiently robust for this purpose. The Commission could have made greater use of existing European analysis and research from NGOs, such as the work of the European Observatory on Homelessness of FEANTSA. This would have enabled it to draw a critical conclusion that is absent from the document: namely, that homelessness is increasing across the EU. While the emphasis on prevention is welcome, there is also an urgent need to reduce the number of people currently experiencing homelessness. This aligns with the commitment made by the 27 Member States and EU institutions under the 2021 Lisbon Declaration. Although the document refers to EPOCH, it fails to acknowledge the need to strengthen it further or to recognise the Commission's essential role in coordination and facilitation.

Detailed comments on the Communication on the Anti-Poverty Strategy

In the overarching Communication mentioned before, the Commission adopts a life-cycle approach to poverty. While this has some merit, it also leaves gaps regarding the depth and duration of poverty and does not fully capture the underlying dynamics of homelessness. A human rights-based approach would have been helpful, particularly given the existence of relevant international and European jurisprudence that could help establish clear norms and standards.

The ambition to end poverty by 2050 is noteworthy, although its overall feasibility may be questioned, and the Commission does not clearly set out what it means. It would be possible to eradicate certain manifestations of poverty, notably homelessness, in that timeframe. FEANTSA therefore recommends revising the objectives of the current 2030 Strategy to include a specific sub-target on homelessness, with measurable interim goals. For example, ensuring that no child experiences homelessness by 2030 would align with the objectives of the Child Guarantee. The European Platform on Combatting Homelessness committed Member States to “work towards the ending of homelessness by 2030” but did not specify further details.

The Commission is right to highlight the issue of non-take-up of benefits. However, it is regrettable that concrete action is limited to child benefits. Greater attention to housing allowances would be particularly valuable, as they can significantly reduce homelessness and housing exclusion.

FEANTSA welcomes the Commission’s intention to mainstream anti-poverty considerations across EU strategies, including the Gender Equality Strategy. However, despite its strong focus on gender-based violence — a key driver of women’s homelessness — the strategy does not include measures likely to reach homeless women. There is significant scope to make this and other strategies more inclusive, such as the Disability Strategy and the LGBTQI Equality Strategy.

It is worrying that the Commission makes no reference to the potential impact of EU migration policy and especially the EU Migration Pact and the recent Return Regulation, on poverty. The fact that their impact on poverty is likely to be negative, certainly in the short-term, is not a sensible reason to ignore them in the Anti-Poverty Strategy.

The initiative to update the Commission Recommendation on energy poverty is also welcome. While there is increasing awareness that energy-efficiency measures often fail to reach the most marginalised — and may even worsen their living conditions — greater effort is needed to integrate homeless people and those experiencing housing exclusion into EU climate policies and the implementation of the Social Climate Fund. Without such integration, reductions in energy poverty may inadvertently lead to increased housing exclusion and homelessness.

FEANTSA questions the added value of updating the European voluntary quality framework for social services. While the framework is robust, it requires adaptation to reflect the diversity of social service sectors. For instance, long-term care services differ fundamentally from crisis services. FEANTSA would particularly welcome the development of a dedicated European quality framework for homeless shelters, given ongoing concerns about poor quality and the allocation of EU funding to inadequate facilities.

The Commission’s intention to update the 2023 report on access to essential services is also welcome. In this context, FEANTSA encourages closer examination of the implementation of Directive (EU) 2020/2184 on access to drinking water and Directive 2014/92/EU on access to basic banking services, both of which recognise homeless people as rights holders. Evidence suggests that these rights are not consistently upheld across Member States.

FEANTSA also supports the Commission’s plan to propose a Council Recommendation on improving access to integrated services. In this regard, it would be beneficial to further develop and operationalise the concept of “one-stop shops” for people experiencing homelessness, as outlined in the CSWD on effective anti-poverty strategies.

The proposal to establish national anti-poverty coordinators in all Member States is welcome, provided that their mandates explicitly include extreme forms of poverty such as homelessness.

FEANTSA welcomes the Commission's ambition to strengthen the participation of people with lived experience of poverty. However, it cautions against tokenistic approaches and emphasises the importance of meaningful, impactful participation. Large, symbolic events that mobilise people punctually are unlikely to be sufficient. The Commission should explore ways to engage people with experience of poverty meaningfully over time, and to support those experiencing extreme poverty like homelessness to engage. Participation should also extend beyond policymaking to include service delivery. In this respect, EU support for peer work would be highly valuable. Peer work — an evidence-based approach in which individuals with lived experience contribute, often as employees, to service delivery — is well developed in the homelessness sector and could be scaled up and extended to other social services.

A major limitation of the Anti-Poverty Package is the absence of a dedicated budget. Whilst there is a target of at least 14% of the NRRP budget for social investment, including anti-poverty measures, experience shows that undeserving issues risk being overlooked when Member States retain excessive discretion. FEANTSA therefore recommends the introduction of ring-fenced funding for key priorities such as homelessness and material deprivation.



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