

# FEANTSA Analysis of the Commission Proposal for a Council Recommendation on Housing Exclusion

## INTRODUCTION

On the 6th May 2026, in the context of the Anti-Poverty Strategy, the European Commission put forward a proposal for a Council Recommendation on Housing Exclusion.

FEANTSA (the European Federation of Organisations working with Homeless People) welcomes this initiative which makes clear that homelessness remains an important priority in the context of the EU's efforts to eradicate poverty.

The following note summarises our analysis of the strengths and weaknesses of the Commission's proposal. We hope it can support the forthcoming negotiations to prepare the text for adoption by the Council.

FEANTSA will publish a separate reaction to the communication on the Anti-Poverty Strategy.

## POSITIVE ASPECTS OF THE PROPOSAL

1. The Commission's proposal sends a strong **political signal** that fighting homelessness and housing exclusion is a core element of eradicating poverty.
2. The proposed Recommendation recognises homelessness as an issue of **human dignity** and **fundamental rights**.
3. The text sets out the legal basis and policy rationale for EU action on homelessness, in line with the principles of **proportionality and subsidiarity**.
4. The adoption of a Council Recommendation would provide a **solid basis** for future policy coordination on homelessness. It could **guide Member States** in the elaboration and implementation of their policies.
5. The proposal represents a step forward in the promotion of evidence-based policies to tackle homelessness, notably promoting a shift from managing homelessness towards progressively ending it through **integrated, person-centred, housing-led policies**. The call for Member States to develop, adopt or revise strategic frameworks that can reinforce efforts towards ending homelessness in the European Union is useful (article 3 (a)). **Many Member States have developed national homelessness strategies in recent years, and the Recommendation will hopefully help further build progress on this front.**

6. The proposal promotes **housing-led approaches**, defined as ‘policy and service delivery models that prioritise the provision of rapid access to adequate, affordable and permanent housing, accompanied, where necessary, by integrated, person-centred support services for housing stability and social inclusion, such as **Housing First**’ (Article 2 (d)).

7. The proposal asks Member States to develop ‘regular, comprehensive, comparable and disaggregated **statistics**’ (Article 4 (a)) on housing exclusion and homelessness, and to ‘quantify and assess the housing needs of homeless persons’ (Article 4 (c)). Given the significant data gaps that persist on homelessness, this is very welcome.

8. The proposal asks Member States to ‘ensure the **meaningful involvement of people with lived experience and civil society organisations** in the design, implementation and evaluation of policies to prevent and reduce housing exclusion and homelessness (Article 13 (f)).

## AREAS OF CONCERN

1. In FEANTSA’s view, the Recommendation is both insufficiently ambitious and overly prescriptive in the **specific objectives** that it asks MS to set. Article 3 (d) of the Recommendation recommends that MS ‘set relevant, time-bound, achievable and measurable objectives, including the following:

- i) Every person sleeping rough (those in ‘primary homelessness’ sleeping in the streets without taking shelter in any living quarters) receives an offer of emergency accommodation;
- ii) People living in emergency or temporary accommodation (those in ‘secondary homelessness’) receive effective support to access to long-term and secure housing solutions as soon as possible

Together, these objectives amount to recommending the **staircase model**. This does not align with the Recommendation’s stated goal of supporting housing-led approaches. Their adoption would represent a step backwards in various Member States, raising the threat of downwards convergence. They amount to a lower level of ambition than the Lisbon Declaration. Furthermore, the objectives make abstraction of the quality, suitability, and safety of emergency accommodation. It might be more pragmatic and useful to ask MS to ‘set relevant, time-bound, achievable, and measurable objectives to **progressively end homelessness, in line with the Lisbon declaration**, without further specification.

2. Whilst it is good that the Commission calls for Member States to develop strategic frameworks, FEANTSA notes that the proposed **formulation** lacks clarity (article 3 (d)). The proposal asks Member States to ‘develop, adopt or revise strategic frameworks on fighting housing exclusion and homelessness’. However, what this means in practice is unclear. As mentioned above, considerable progress has been made in the development of **national and regional homelessness strategies** in recent years. This Recommendation should build on, and further promote, this progress. We fear additional burden and confusion stemming from a call for new, broader “strategic frameworks” might be unhelpful in this respect. This might be addressed by inserting a reference to the importance of national/regional homelessness strategies.

3. FEANTSA is concerned that the new focus on fighting housing exclusion may **dilute policy attention to homelessness, which is an urgent and established priority in its own right**. Changing the title to *Council Recommendation on Fighting **Homelessness** and Housing Exclusion* could help to address this.

4. Homelessness and housing exclusion are **not clearly defined** in the proposal. There are inconsistencies between the recitals and article 2 on definitions. In recital 18 homelessness is defined as 'people sleeping rough and in emergency and temporary accommodation for the homeless'. This is a narrow definition that does not align with those used by many Member States, nor with established European frameworks like ETHOS and ETHOS Light, referred to later in the recitals. Defining homelessness too narrowly leads to inadequate policy and service design. It would therefore help to define homelessness clearly and consistently in the text.

5. The proposal contains a blind spot regarding the **existing obligations under EU law when it comes to preventing homelessness amongst applicants for and beneficiaries of international protection**. In FEANTSA's view, the Recommendation should include a reference to Directive (EU) 2024/1346 of the European Parliament and of the Council of 14 May 2024 (recast) laying down standards for the reception of applicants for international protection. This stipulates that applicants for international protection are entitled to material reception conditions which include housing, food, clothing, personal hygiene products and a daily expenses allowance (RCD article 2(7)), with harmonised standards across the EU. The omission of any reference to the Directive is worrying at a time when numerous Member States are failing to live up to their obligations, leading directly to homelessness amongst applications for international protection. Similarly, **reception or asylum centres are conspicuously absent** from the list of institutions from which people should be discharged with support to provide housing (article 5 (j))

6. The proposal contains no **prohibition of the criminalisation of homelessness** or inhumane treatment of people experiencing homelessness, even though these persist within the European Union.

7. The proposal focuses on the prevention of housing exclusion but **not prevention of homelessness specifically**. The recitals draw on the academic literature on homelessness prevention to distinguish between universal prevention measures, upstream interventions targeting high-risk population, crisis prevention for persons and households facing imminent homelessness, and emergency-stage interventions. However, this framework is not applied in the articles on prevention, which FEANTSA considers a missed opportunity.

8. The proposal recommends that Member States boost the **supply of social and affordable housing** but remains vague about how exactly to ensure that this serves people experiencing or at risk of homelessness. The primacy of **social housing** as tool to address homelessness is not clearly stated, for example. The proposal does not contain a clear **ask for Member States to scale up Housing First**, in line with need. In the same vein, the proposal focuses on '**innovative financing models**' but neglects the essential role of grants and subsidies in making housing affordable for those with very low incomes.

9. The proposal only asks Member States to report to the Commission **every five years** on the results of their national monitoring activities and on progress made in implementing this Recommendation. From FEANTSA's perspective, this is too infrequent to ensure forward momentum. We recommend that the Commission organise a **biennial progress report** on ending homelessness in Europe.

10. The proposal lacks a **clear statement on the Commission's own future action on homelessness**. In FEANTSA's view, the final paragraph should welcome the Commission's intention to take a few concrete steps to advance the implementation of the Recommendation. These could include further development and adequate resourcing of EPOCH; providing guidance to Member States on use of EU funds to tackle homelessness; supporting the involvement of Civil Society Organisations working with homeless people and people with lived experience in EU policymaking; regularly monitoring Member States' progress towards ending homelessness; integrating homelessness and housing exclusion in the EU Semester; ensuring consistency across EU policies to support the fight against homelessness; ensuring that homelessness is addressed through the Housing Alliance and the pan-European Investment Platform for Affordable Housing.

11. The Presidency Conclusions on Affordable Housing, put forward by the Danish Presidency and supported by 26 other MS in December 2025 (15709/25) invited the European Commission to *inter alia*:

'PROMOTE stronger cooperation at EU level on homelessness, building on the work of and further strengthening the **European Platform on Combating Homelessness** and housing-led policies such as the **Housing First Principle**; and CONSIDER whether a proposal for a new **Council Recommendation on ending homelessness in Europe** could contribute to this end.

Overall, the proposal for a Recommendation only partly responds to this invitation. It does not set out clearly how EU cooperation on homelessness will be strengthened, nor what will be the next steps for the European Platform on Combatting Homelessness. It is notable that the Council asked for a Recommendation on ending homelessness and the proposal is for a Recommendation on housing exclusion. In light of this, the forthcoming EPSCO conclusions on affordable housing offer an opportunity for the Council to repeat its key requests towards the Commission on homelessness.

## CONCLUSION

FEANTSA congratulates the European Commission on having proposed this Council Recommendation and celebrates many positive aspects of the text. We would welcome its adoption. However, we also identify important and rectifiable weaknesses.

We encourage Member States to try to work to improve the text in the forthcoming negotiations.

Overall, we think that 5 years after the adoption of the Lisbon Declaration, EU coordination efforts on homelessness should move towards a concrete action plan, orientated towards impact.

For more information contact Ruth Owen:  
ruth.owen@feantsa.org



Co-funded by the European Union.  
By the EaSI strand of the ESF+ programme.

Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or ESF+. Neither the European Union nor the granting authority can be held responsible for them.



**FEANTSA**

**European Federation of National Organisations  
Working with the Homeless**

194 Chaussée de Louvain, 1210 Brussels, Belgium  
T +32 (0)2 538 66 69 • [information@feantsa.org](mailto:information@feantsa.org)

**[www.feantsa.org](http://www.feantsa.org)**

**Follow us**

 [/FEANTSA\\_ORG](https://www.instagram.com/FEANTSA_ORG)

**Like us**

 [/FEANTSA](https://www.facebook.com/FEANTSA)

**Follow us**

 [@FEANTSA](https://twitter.com/FEANTSA)

**Connect with us**

 [FEANTSA](https://www.linkedin.com/company/FEANTSA)