FEANTSA REPORT

NOVEMBER 2025

POLICY GUIDANCE FOR DESIGNING A SOCIALLY FAIR NATIONAL BUILDING RENOVATION PLAN (NBRP)

FEANTSA

AUTHOR:

Luca Szöllősi, Solidarity Economy Centre & Anna Bajomi, PhD, FEANTSA

DESIGN BY:

Bryony Martin, Communications Officer, FEANTSA

COVER IMAGE:

Kiss Eszter // Habitat for Humanity Magyarország

Contents

List of abbreviations

ESOS	Energy Saving Obligation Scheme
ESCO	Energy Service Company
NECP	National Energy and Climate Plan
NBRP	National Building Renovation Plan
LTRS	Long-Renovation Plan
SCP	Social Climate Plan

1. Introduction

This guidance document is intended for national policymakers and civil servants responsible for drafting National Building Renovation Plans (NBRP) under the revised Energy Performance of Buildings Directive (EPBD, 2024). It serves as a technical companion to support the integration of social fairness and energy poverty considerations across the planning process, to bring the most out of the plans. Structured to align directly with the mandatory template for the plans in Annex II of the EPBD, the guide's headings mirror relevant sections of the NBRP template and the EPBD and offer concrete recommendations, policy instruments, and implementation examples. While Hungary is used as an example to provide context, the guidance is relevant across national contexts. Policymakers can use this guide as a reference when developing specific sections of the NBRP and when designing safeguards and financing tools that ensure no household is left behind in the renovation wave.

1.1. Executive Summary: Designing Socially Inclusive National Building Renovation Plans

This guidance document supports national policymakers in developing a National Building Renovation Plan (NBRP) that is not only compliant with the Energy Performance of Buildings Directive (EPBD, 2024) but also socially meaningful, equitable, and effective.

The NBRP is more than a legal obligation. By enabling renovations that address housing inadequacies and reduce the energy needs of homes, it enhances **economic competitiveness**, improves **energy security**, and promotes **social cohesion**. Fixing the problem of unfit housing can significantly improve health outcomes among structurally disadvantaged groups. Reducing energy needs in the dependence and buildings helps stabilise household budgets, lowers national fossil fuel dependence, and creates skilled jobs in renovation and renewable energy sectors. Ensuring that low-income and disadvantaged households benefit from renovation programmes also builds trust in public institutions and strengthens democratic resilience during the green transition.

1.2. What the guidance covers

The document follows the structure of the EPBD Annex II template and offers policymakers practical recommendations, policy instruments, and safeguards to ensure that the renovation of buildings contributes to a just and inclusive energy transition. The example from the Hungarian context brings the guidance closer to reality. Anchoring the guide in a specific national context showcases how the NBRPs planning process can pick up and tackle concrete problems. Hungary was chosen deliberately to highlight specific challenges that are often overlooked yet represent some of the most severe forms of energy poverty in the EU, particularly in Central and Eastern Europe. These include the high energy cost burden on household budgets despite relatively low prices, the concentration of the worst-performing buildings in low-income rural areas, the widespread reliance on firewood among the poorest households, and the guidance includes:

- **Targeting worst-performing buildings:** Identifying and prioritising homes that combine high energy needs with low incomes, ensuring public support is directed where it is most needed.
- **Minimum Energy Performance Standards (MEPS):** Implementing MEPS in non-residential buildings and, where appropriate, in residential ones, with safeguards in place.
- **Social safeguards:** Introducing rent caps, anti-displacement and anti-eviction measures, full subsidies for the lowest-income households, and effective monitoring systems.
- **Equitable financing:** Designing funding schemes that avoid regressivity and ensure support reaches households least able to invest.
- **One-stop shops and technical support:** Providing administrative, legal, and technical assistance tailored to structurally disadvantaged groups.
- **Decarbonising heating and cooling:** Phasing out fossil-based systems in ways that prevent social harm.
- **Supporting public service buildings:** Ensuring that homeless services and social care institutions also benefit from renovation support.
- **Skills, education, and labour policy:** Developing an inclusive, well-trained workforce capable of delivering deep renovations.
- **Indoor environmental quality:** Tackling damp, indoor air pollution, and unsafe heating in the poorest homes.

By applying the measures outlined in this guide, national policymakers can deliver a National Building Renovation Plan that reduces emissions and energy poverty, maximises public investment impact, and ensures that the benefits of the Renovation Wave reach those who need them most.

2. National Building Renovation Plans as a requirement under the EPBD

The European Union's Energy Performance of Buildings Directive (EPBD), recast and adopted in 2024, requires all Member States to make adequate efforts and take targeted action to reduce GHG emissions from fossil fuels in buildings and to achieve the EU's climate neutrality targets for 2050. The revision of the Directive on the Energy Performance of Buildings is part of a broader legislative package called the 'Fit for 55', covering a wide range of policy measures to achieve the reduction of net greenhouse gas emissions (GHGs) of at least 55% below 1990 levels by 2030. One of the novelties of the revised EPBD is the mandatory preparation of National Building Renovation Plans by Member States, an integrated planning and assessment tool following a common EU-wide template.

The extent to which the National Building Renovation Plan can ensure social fairness in the transition to climate-neutrality will greatly depend on the ambition and scope of the policies it sets out. Vice versa, the success of the clean energy transition greatly depends on policymakers' ability to deliver to the most vulnerable. This document provides guidance on recommended approaches to minimise the social risks and potentially regressive outcomes of renovation policies, while maximising their positive social impact and the effective use of public funding in the design of policy measures for national building renovation plans. This guide aims to offer recommendations on how the NBRP can be a powerful tool to diminish the socially regressive effects of the energy transition and maximise the positive social returns of energy-efficient renovations. Structured around key socially relevant elements of the National Building Renovation Plans template, it offers guidance for good practices, policy instruments and social considerations to consider when drafting renovation plans.

2.1. The Hungarian Challenge

In Hungary, the building stock accounts for 40% of the country's total final energy consumption, with households in the residential sector responsible for 32% of that total. According to Hungary's second National Climate Change Strategy (NÉS-2), 70% of the country's total residential building stock of around 4.4 million dwellings is energetically inefficient, failing to meet modern functional, technical, and thermal requirements. According to the average of energy certificates, roughly 60 percent of the housing stock is classified as very poor (JJ), poor (II) or poor (HH). Thirty percent of dwellings fall into the energy classes of near average (GG), average (FF) or above average (EE), and less than 10 percent fall into one of six categories of up-to-date energy performance, of which near modern (DD) is the poorest and minimum energy (AA++) is the best. The worst-performing buildings are mostly single-family units, occupied by owners who have lower incomes and limited or no savings. Energy inefficiency is only one of several challenges: utility debt, lack of access to basic services, and inadequate housing conditions—such as leaks and damp—are also disproportionately concentrated among the lowest-income households living in the worst-performing buildings. This accumulation of problems adds significant complexity to the renovation effort.

While various home improvement and renovation support schemes are available from the state, they have been largely untargeted and, before 2024, lacked energy efficiency requirements. These schemes are inaccessible for the lowest-income households and tend to provide disproportionately higher support to higher-income groups who can afford the upfront investment. At the same time, the annual rate of energy retrofits remains far below 1%, the acceleration of which is indispensable for achieving the timely upgrading of the building stock. This requires a significant increase in the current renovation rate, public support for energy efficiency interventions and the development of a differentiated, multi-annual and well-designed support scheme.

The complex challenge of low-performing buildings is not unique to Hungary. The 'energy poverty periphery' of Europe, referring to Southern and Eastern countries, exhibits a more pervasive presence of energy poverty across a range of social strata compared to core countries, where energy deprivation is limited specific groups. Central and Eastern European Member States may have different renovation programmes in place, but they also face common structural factors such as high homeownership rates, lower household incomes, and a higher energy burden on residents.

2.2. Socially inclusive decarbonisation

The transition to clean energy is not just a technological challenge, but a multidimensional socio-economic transformation. Reducing fossil-based energy consumption and carbon emissions is a cornerstone of achieving the energy transition, with energy-efficient building renovation at its core. Changing the way energy is produced, generated and used has a direct impact on citizens' well-being and quality of and is therefore of major socio-political importance, requiring the development of a socially inclusive and carefully designed public policy system. The national building renovation plan (NBRP) is a key tool to achieve this transition. It allows Member States to develop measures tailored to the specificities of their building stock, with financing and policy instruments adapted to local circumstances. The revised EPBD mandates that Member States develop National Building Renovation Plans that balance decarbonisation goals with protections for vulnerable population. Therefore, the NBRP represents a powerful opportunity not only to offer a professionally sound and comprehensive roadmap for reducing building-related emissions, but also to address social inequalities through inclusive renovation strategies.

Mandatory elements:

- An overview of the national building stock and market barriers;
- A roadmap with targets and progress indicators to achieve 2050 goals;
- An overview of policies and measures supporting the roadmap;
- A mapping of investment needs, financing sources, and administrative resources;
- Thresholds for greenhouse gas emissions and energy demand for zero-emission buildings;
- Minimum energy performance standards for non-residential buildings;
- A national renovation trajectory for residential buildings with 2030 and 2035 milestones;
- An estimate of expected energy savings and wider benefits.

3. Social fairness: a strategic priority

3.1. Why make renovation plans socially meaningful?

While buildings are often approached as a matter of technical and engineering expertise, they ultimately house and serve people from diverse backgrounds and social situations. The revised EPBD calls for Member States to take extra precautions to ensure that no one is left behind in the implementation of the Renovation Wave strategy. It emphasises that renovation must go beyond technical compliance to include the social implications of the transition. Member States should commit to preparing national building renovation strategies that prioritise the broadest possible societal interests, ensuring that social welfare is not an afterthought in building renovations. The EPBD mandates that the technical, economic and social challenges of renovations should be addressed in a way that creates the most equitable outcomes. Overlooking these requirements can result in adverse social outcomes, which in turn can undermine popular social and economic support for energy efficiency.

3.2. Public policy instruments for equity

The purpose of this guide is to show how the renovation of the buildings with the poorest energy performance offers the greatest potential for savings and benefits. As such, renovation of this segment of the building stock should be regarded as a strategic priority. At the same time, the worst-performing buildings are typically occupied by low-income, disadvantaged families, who face the greatest barriers to renovation and the implementation of the transition to renewable energy. Achieving climate targets and a successful energy transition requires not only a technological shift, but also a socially responsible approach, through the appropriate public policy instruments, to ensure that the necessary building renovations are carried out in an equitable and accessible way. It is of the utmost importance, then, that the NBRP gives due attention to upgrading this segment of the building stock. Otherwise, these properties risk being excluded from the benefits of building renovation and clean energy measures.

4. Guidance

In the following sections, we will navigate through the most relevant components of the National Building Renovation Plans to showcase how to prepare them in a socially meaningful and fair way. Each heading below corresponds to a specific section required by the template set out in Annex II of the EPBD.

Overview of implemented and planned policies and measures

Article 3 of the EPBD states that the national building renovation plans have to provide a roadmap for the renovation of the national stock of (both public and private) residential and non-residential buildings. In addition to a list of quantified renovation and emissions-savings targets, the plan will have to include a detailed overview of implemented and planned policies, support schemes, financing instruments and sources of funding through which implementation will be made possible.

4.1. The identification of cost-effective approaches to renovation for different building types and climatic zones

Article 2(32) of the recast EPBD defines cost-optimality as 'the energy performance level which leads to the lowest cost during the estimated economic life cycle. This cost is determined based on the cumulative consideration of six aspects:

- Building category and use;
- Costs of energy-related investments;
- Maintenance and operating costs;
- Environmental and health externalities of energy use;
- And where applicable: earnings from energy produced on-site and waste management costs.

The Commission's cost-optimality guidelines include detailed methodologies for calculating cost-optimal levels of energy performance in buildings. These calculations factor in energy cost savings — which, for households affected by energy poverty, are often minimal due to already low energy consumption levels that fall short of meeting basic needs — as well as **macroeconomic** health and environmental benefits. In particular, Member States must include the health and environmental impacts of air pollution in their macroeconomic calculations of global costs related to energy use in buildings. This means that when they calculate the overall or 'global' cost of energy use across the building sector, they must also consider the damage caused by pollution from heating systems at a macro level. This includes the impact of:

- **Fine particulate matter (PM2.5)** – harmful particles mostly from burning wood, coal, and other solid fuels.
- **Nitrogen oxides (NOx)** – gases mainly from oil and gas heating systems.

These calculations focus on **the big picture — national impacts** of air pollution. The document rightly highlights that **bioenergy (such as wood burning) is responsible for around 50% of PM2.5 emissions in the EU**, and since 'PM2.5 is the main driver of the health effects of air pollution', it is a key concern.

These EU requirements only apply to **macro-level** or system-wide assessments. If **micro-level** calculations were also required, it would mean evaluating direct impacts such as health effects from indoor air pollution. Additionally, other aspects of indoor environmental quality, which are heavily dependent on the quality of the heating system and the energy efficiency of the building, could be assessed, and their significant impact on health and economic externalities could be taken into consideration. **This would result in a more comprehensive assessment of cost-optimality that includes the impact of energy efficiency measures on indoor environmental quality and consequently on health, school and work performance.**

The current mandatory criteria for cost-effectiveness overlook crucial benefits, such as improved health, better educational outcomes, greater social inclusion, and the associated returns to the public budget. In 2014, the Commission gave guidance to Member States to apply selection criteria that prioritise more cost-effective projects. This includes assessing the relative costs and benefits of investments, considering co-benefits and externalities such as health improvements, social cohesion, urban regeneration, job creation, economic growth, reduced air pollution and climate impacts, and savings to public budgets. Energy efficiency investments should generate these benefits and be prioritised based on their cost-effective contribution to policy objectives. While most Member States recognise these co-benefits in their planning documents, they are rarely used to inform indicators that measure the effectiveness of the measures. A narrow definition of "cost optimality" leads to prioritisation that leaves behind buildings most in need of renovation — those housing energy-poor and low-income households — due to underestimated social and health returns.

To ensure that National Building Renovation Plans target the worst-performing homes equitably and effectively, Member States must include multiple benefits of energy efficiency. They must go beyond a definition of 'cost optimality' that narrowly focuses on macro-level returns and financial metrics such as cost per unit of energy saved (e.g., €/kWh) and instead include the wider (socio-economic and health) impact of the measures across multiple dimensions.

This section outlines how to integrate these broader benefits into the definition of cost-effectiveness in renovation planning, with particular attention to Hungary's poorest households.

Multiple benefits of energy efficiency

Source: SECCA, Sustainable energy knowledge hub

Wider social and health benefits

This narrow framework of cost-optimality overlooks some of the greatest socio-economically relevant benefits of energy efficiency measures. To effectively guide renovation efforts, the cost-optimality methodology should be expanded to include the broader benefits that are often excluded from return rate calculations, in order to more accurately capture the full value of energy efficiency investments. Cost-optimality assessments should be informed and inspired by the multiple environmental, social, economic and health benefits offered by energy efficiency upgrades, such as:

- Health savings due to improved health conditions: better air quality and improved indoor environmental quality (IEQ) lead to fewer respiratory and cardiovascular issues, increased mental health, and the reduction of excess winter and summer mortality. In turn, this reduces demand for public health services.
- Higher school and work performance: better IEQ reduces housing problem-induced sick leaves, contributing to competitiveness and improved performance
- Significant long-term cost reductions for households: reduced energy bills can create growth in household savings and disposable income
- Accelerated economic activity in the construction and industrial sectors
    - GDP growth,
    - boosted local economies,
    - higher employment and
    - lower social welfare expenditures
    - Positive environmental impact through emissions reduction

Indoor environmental quality and renovation targeting

Indoor environmental quality (IEQ) is one of the most overlooked but essential components of social well-being. Mould, damp, inadequate ventilation, and heating with polluting fuels are widespread in Hungary's worst-performing homes — affecting health, safety, and cognitive development. Yet these factors are not captured in cost-optimality formulas, leading to underinvestment where the need is highest.

Applying the wider benefits framework of energy efficiency measures in cost-optimality calculations ensures not only that the worst-performing homes are more likely to be considered, but public investment can be directed where returns to public budgets are the greatest. For example, in Hungary, firewood heating is the predominant heating method of the lowest-income groups and the least performing homes. Outdated individual stoves contribute to macro air pollution statistics (considered in cost-optimality) but also have a detrimental impact on indoor environmental quality due to indoor air pollution and unstable temperatures. This latter aspect is currently neglected in cost-optimality calculations. Including improved IEQ-related savings could ensure that fewer people are left behind, while ensuring that policies are implemented with the highest possible impact. Comprehensive cost-effectiveness calculations that consider health savings from improving leaky, damp, mouldy and smoky homes should be an integral part of the national building renovation plan.

Policy considerations

- **Broaden cost-optimality definitions:** Integrate indicators for health, improved indoor environmental quality and other larger benefits into renovation cost-effectiveness assessments — not just direct energy saving.
- **Target structurally inadequate homes:** By incorporating indoor environmental quality into cost-effectiveness metrics, homes relying on solid fuels, lacking ventilation, or suffering from mould/damp would be flagged as priority targets, even if their energy use is low due to self-restricting behaviours of occupants.

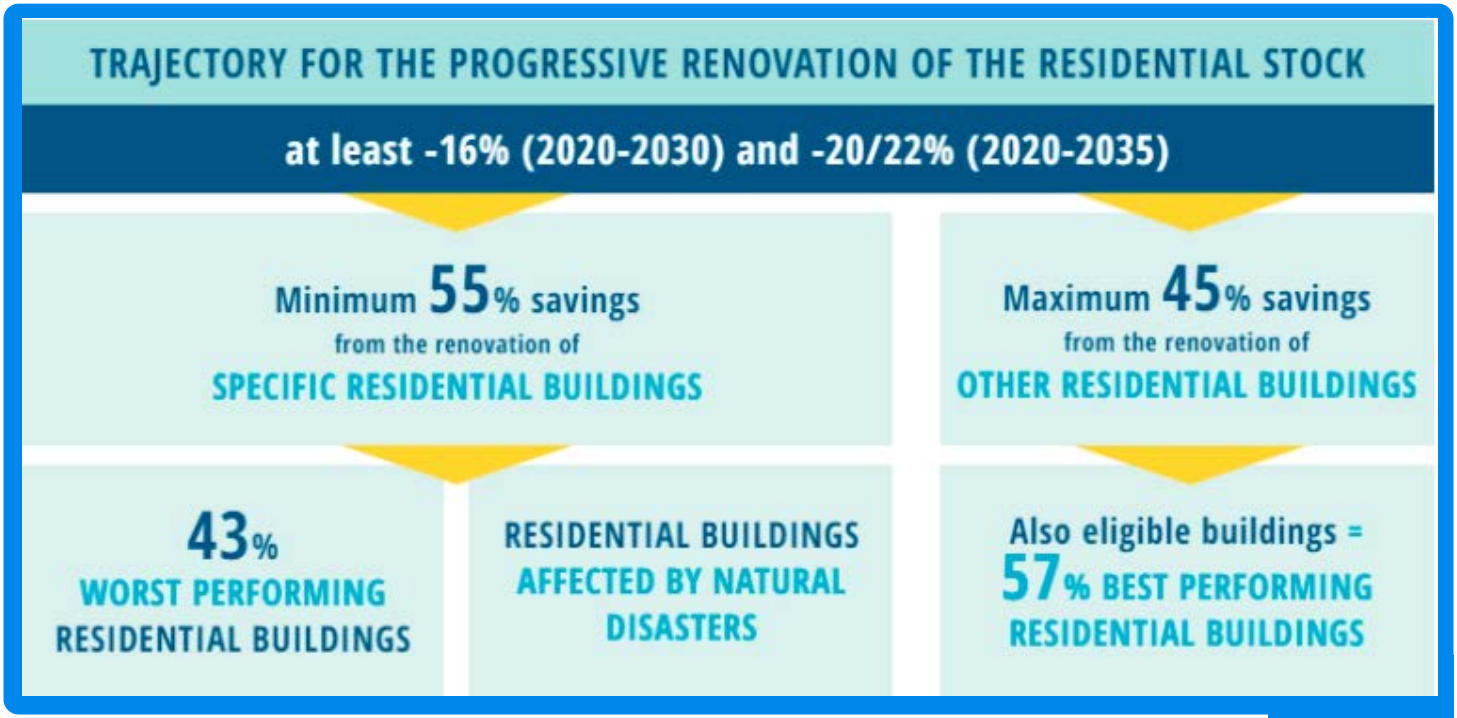
4.2. National minimum energy performance standards [..] and other policies and actions to target the worst-performing segments of the national building stock, including safeguards as referred to in Article 17(19)

The recast EPBD sets new requirements for the renovation of the worst-performing residential and non-residential buildings.

Residential buildings

Member States are required to establish national trajectories for reducing the average primary energy consumption of residential building stock from the 2020 baseline to 2050. These trajectories must include intermediate five-year milestones, beginning in 2030.

The depth and rate of renovations in the residential sector will have to result in a minimum of 16% reduction in average energy use compared to 2020 levels, increasing to at least 20-22% in 2035. In addition, the EPBD requires that a



Source

minimum of 55% of energy savings must come from the renovation of the 43% worst-performing residential buildings and those dwellings that were affected by natural disasters.

While minimum energy performance standards are mandatory only for non-residential buildings, the EPBD mandates that 'in their renovation efforts to achieve the required decrease in the average primary energy use of the entire residential building stock, Member States shall put in place measures such as minimum energy performance standards [MEPS], technical assistance and financial support measures.' (Article 9 of the EPBD). At the same time Article 17(19) on financial incentives requires Member States to 'introduce effective safeguards, to protect in particular vulnerable households, including by providing rent support or by imposing caps on rent increases, and may incentivise financial schemes that tackle the upfront costs of renovations [...]' In Hungary, this means that effective rent caps or regulations should be implemented, and financial support for renovations should be modified to eliminate upfront cost requirements for vulnerable groups. To learn more, see the section on *4.2.1 Social Safeguards*.

As the lowest energy performing buildings require the greatest renovation effort and are typically occupied and owned by lower-income and often vulnerable households, they face the greatest barriers to renovation and the transition to renewable energy. Several hundred thousand residents who live in the worst-performing buildings are affected by severe housing and energy deprivation. According to Habitat for Humanity Hungary's 2024 Housing Poverty Report, nearly 17% of the total population lived in overcrowded housing in 2022, including almost a third (30.7%) of the population aged 0-17. In addition, 475,000 households reported that their inhabited home has serious problems (i.e. the roof structure of the dwelling leaks, or the walls/flooring/foundation are damp, or the windows or flooring is rotten), representing 11.6% of all households. Nearly 90,000 households lived in a property without a toilet or bathroom and/or running water. Furthermore, 8% of households were unable to adequately heat their home, with low-income households paying 14.86% of their income on en-

ergy (the third highest in the EU). This is despite the state-capped utility prices that keep energy costs relatively low, pointing to the fact that households' high energy burden is also strongly related to the poor energy performance of the dwellings and low incomes.

Policy considerations for residential buildings

- Renovation trajectories for the worst-performing homes should prioritise improvements of inadequate homes, either by renovation or proper replacement. Renovation of worst-performing buildings should be supported by adequate financial, administrative and technical support and should address housing inadequacies beyond energy efficiency.
- The renovation of worst-performing homes should be accompanied by a legal definition of what constitutes 'inadequate housing' and a system of normative support for improving the pre-existing structural faults of buildings to ensure that minimum decent housing standards are met.
- In case a member state decides to implement MEPS in the residential sector, no households should be penalised if they cannot meet MEPS due to financial incapacity or the state of their homes.

Non-residential buildings

The introduction of minimum energy performance standards (MEPS) for non-residential buildings is one of the provisions aiming to boost the renovation of the worst-performing buildings.

- Member States need to define a maximum energy use limit under which only the worst 16% of non-residential buildings fall above
- Then, they need to make sure that by 2030, all non-residential buildings have been renovated so they are better than the worst 16% level.
- By 2033, all buildings must also be better than the worst 26% level from today.

In short, countries must identify and gradually upgrade the buildings that waste the most energy, starting with the worst 16% by 2030 and moving to the worst 26% by 2033.

If a building does not meet these standards, owners and operators may be obliged to carry out certain upgrades to achieve a higher energy efficiency rating. While the introduction of minimum standards for existing buildings may act as an incentive, it alone does not guarantee the renewal of the worst-performing segment of the building stock, especially where there is a lack of workforce, adequate financial resources and the capacity of building owners to carry out the retrofits. Importantly, the introduction of mandatory MEPS does not apply to residential buildings.

- Non-profit organisations and social welfare institutions, including social services like homeless service providers, often occupy low-performing non-residential buildings. If these buildings fall under MEPS, adequate financial, technical and administrative assistance should be provided to enable compliance.

4.2.1 Social Safeguards

Why safeguards are essential

Policy measures targeting the worst-performing segment of buildings should include social safeguards. Social safeguards are policies and procedures designed to avoid, mitigate, and manage negative social impacts and to enhance the impacts of positive ones. Building renovations could significantly improve the quality of life of vulnerable groups if well-designed and properly targeted.

Risks: displacement, evictions, rent hikes

Renovations can also negatively impact vulnerable populations by

- leaving them behind due to lack of targeted financial, technical and administrative support,
- imposing increased housing costs,
- penalising low-income groups for not being able to comply with renovation requirements
- displacing or evicting households, in preparation for or after renovations.

MEPS can significantly improve the efficiency of the building stock, making homes healthier and reducing energy needs. At the same time, their implementation might put certain vulnerable target groups in difficult situations. Complying with MEPS could mean complex renovation works that require immense investment costs, while support is not automatically provided. Although good energy ratings increase the value of the property, they also make dwellings with better energy certificates more expensive and harder to access for low-income households, both in terms of homeownership and tenancy. High energy performance standards in the rental sector could lead to the exclusion of a significant share of less efficient homes that are usually rented at a more affordable price. While ideally all households should live in decent homes that are affordable both in terms of rent/price and energy costs, in reality, improved energy efficiency can lead to reduced affordability.

Safeguards in the EPBD

The EPBD outlines two sets of safeguards. The NBRP template refers directly to safeguards to protect vulnerable households under Article 17, point 19. These include:

- rent support, caps on rent increases, and
- financial schemes that tackle the upfront costs of renovations, such as on-bill schemes, pay-as-you-save schemes or energy performance contracts are also mentioned.

The EPBD includes another set of provisions that aims to protect vulnerable households. Article 9(4) of the EPBD requires Member States to 'support compliance with minimum energy performance standards by all of the following measures':

- providing appropriate financial measures and technical assistance, including through one-stop shops with a particular focus on vulnerable

households and, where applicable, people living in social housing,

- designing integrated financing schemes that provide incentives for deep renovations and staged deep renovations, under Article 17;
- removing non-economic barriers; including split incentives [the person paying for energy efficiency upgrades (e.g. a landlord) is not the one benefiting from the energy savings (e.g. a tenant), reducing motivation to invest]; and
- monitoring social impacts on the most vulnerable households.
- While not directly required in the NBRPs, we recommend addressing the full set of safeguards in the plans and expanding the safeguards related to MEPS to any renovation programs. In the following paragraphs, we further elaborate on the most relevant social safeguards.

Safeguard #1: The protection of tenants from evictions due to rent increases through rent caps.

One of the most frequently cited benefits of energy-efficient building renovations is the prospective increase in property value. However, the increase in the market value of housing can also lead to sudden rent hikes, or, in the case of properties that are still undergoing renovation, energy efficiency standards can lead to property owners passing on the cost of renovation to tenants, also in the form of increased rents. In some countries, including Germany, landlords are allowed to raise rents beyond the usual limits if they carry out energy-saving renovations, effectively presenting a loophole to circumvent existing rent caps. In many cases, tenants in rented accommodation are low-income households for whom renting is not a choice, but a necessity due to circumstances that prevent them from purchasing a property. Some retrofitting policies and programmes, rather than increasing living standards and making more quality affordable housing available, push the most vulnerable households to be evicted from their homes due to rent increases. When post-renovation rent increases are capped based on 'cost neutrality,' the calculation often relies on projected energy savings rather than actual ones. In practice, these savings can be two to three times lower, leaving tenants with rent increases that exceed the actual energy cost savings.

Therefore, in incentivising energy-efficient renovations, there is an inherent social risk: unless safeguards are in place, landlords raising rents following a renovation will result in the forced displacement of sitting tenants who are no longer able to cover the increased expenses. This is an especially pressing concern in metropolitan areas with booming rental markets and a higher chance of housing price speculation. To prevent renovictions (a contraction of 'renovation' and 'eviction'), recital 63 of the EPBD states that the NBRP should be prepared to provide safeguards for tenants, such as rent caps or subsidised rent and put sanctions and incentives in place to encourage landlords to keep rents affordable for sitting tenants. Article 17(17 & 19) requires Member States to address the eviction of vulnerable households caused by disproportionate rent increases following energy renovation of their residential buildings.

Beyond rent increase after renovations, displacement can also happen through other means, depending on the strength or weakness of tenant protection mechanisms in place. This can include terminating tenancies due to outstanding rent, ending informal rental arrangements or not renewing fixed-term rental contracts with lower-income or less desirable tenants in anticipation of individual or district-level renovations. In addition to tenants, the poorest homeowners in multi-apartment buildings might also be forced to relocate if they can't keep up with increased common costs resulting from building renovations. Lack of transparency in the renovation process and resulting costs, combined with inadequate consideration of tenants' needs during the renovation, can also lead to out-migration.

In Hungary, preventing renovictions requires a large-scale regulatory reform of the rental sector. This includes the introduction of stricter regulations for the rental market to increase transparency and traceability, as well as the creation of a legal framework that enables rent control and tenant protection.

Policy considerations:

Rent Increase Caps: the EPBD mandates Member States to 'introduce effective safeguards, to protect in particular vulnerable households, including by providing rent support or by imposing caps on rent increases' (article 17(19). We suggest limiting post-renovation rent hikes to ≤50% of real-life energy cost savings. Energy savings before and after renovations should be based on the actual energy consumption of the household. This should ideally include individual energy-use profiles.

> **To be avoided**: calculations of energy cost savings based on the theoretical energy use of the home (e.g on the energy performance certificate and post-renovation forecasts). Low energy label dwellings tend to consume significantly less energy than predicted by the label; therefore savings cannot be calculated based on the EPC. Calculating rent increases based on average energy cost savings (as opposed to individual energy-use profiles) leads to higher costs post-renovation for households that saved on energy

Full support for the lowest-income homeowners in multi-apartment buildings: Members states should follow the example of the **Multi-Apartment Buildings Modernization Program in Lithuania**, which provided 100% up-front grants for the lowest-income residents in multi-apartment buildings. This enabled their participation without risking financial instability and **removed** the barrier of residents voting against renovations in residential assemblies due to their financial limitations.

> **To be avoided**: significantly reducing the number of votes necessary for renovation without ensuring that households that are not supporting the renovations due to financial or other significant reasons can also take part.

Tenant and owner organisations: in larger-scale renovations, public bodies should facilitate the setup of independent tenant and owner organisations that work directly with vulnerable residents. Negotiating on temporary or final relocation, compensation or other renovation related issues in an organised man-

ner gives power to tenants or owners who might reach less favorable agreements if negotiating alone.

> **To be avoided**: In the context of district-level renovations, negotiating individually with tenants and owners creates **power imbalances**. A public authority or private investor often holds significantly more leverage than individual tenants or low-income homeowners, who may lack the information, resources, or legal support to fully protect their rights or interests.

The **impact of MEPS** on the **affordability of rental and owner-occupied homes should be strictly monitored**; in case of adverse effect on affordability, introduction of MEPS should be delayed and compensated

> **To be avoided**: The **reduction of affordable rentals or homeownership.** The impact of MEPS on the affordability of rental and owner-occupied homes should be strictly monitored. The reduction of affordable rentals or homeownership should be prevented. It is important to include measures listed in relation to the implementation of MEPS in the description of safeguards. In the following section we provide details on all safeguards listed in the EPBD to inspire how to include them in the NBRS:

Safeguard #2: Providing appropriate financial measures, in particular those targeting vulnerable households, people affected by energy poverty or, where applicable, living in social housing, by Article 24 of Directive (EU) 2023/1791;

Appropriate financial measures and equitable access to funding are essential to unlock the benefits of renovation for vulnerable households, people affected by energy poverty, and residents of social housing.

EU Legal Requirements

Article 24 of the Energy Efficiency Directive (EED) obliges Member States to:

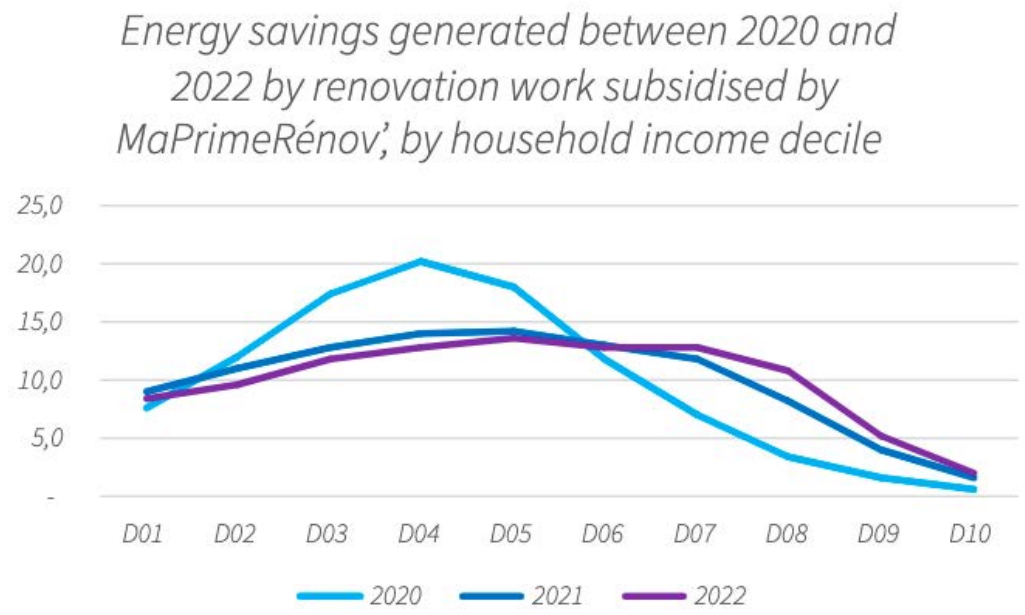
- Implement energy efficiency improvements that mitigate distributional impacts;
- Make best use of national and EU-level public funding, including ETS revenues, for investments benefiting vulnerable and energy-poor households.

Article 17 of the Energy Performance of Buildings Directive (EPBD) requires:

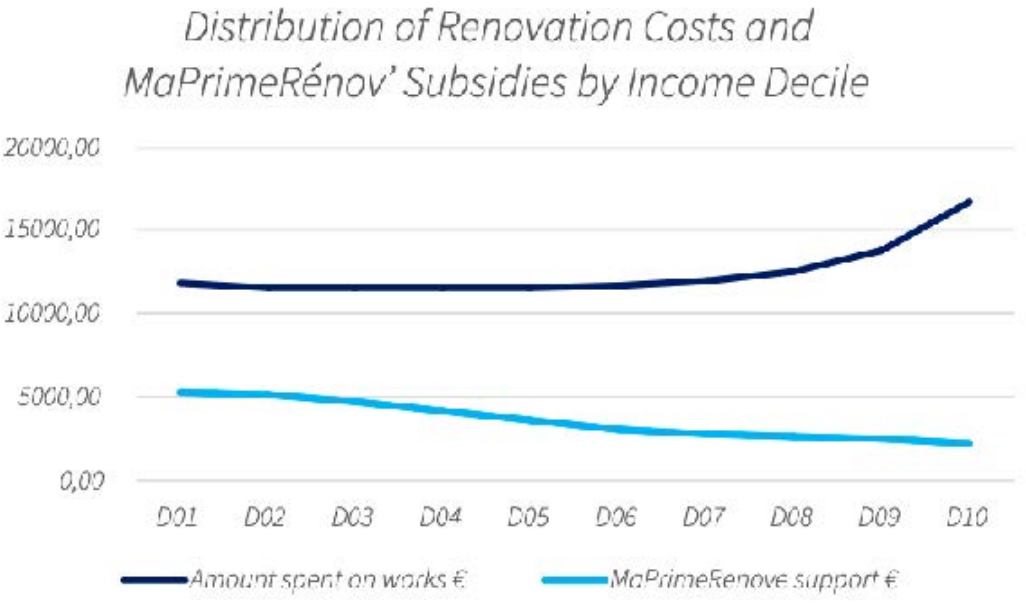
- Financial incentives that prioritise vulnerable, energy-poor households and people living in social housing;
- Consideration of revenue-based parameters and national energy efficiency funds to support building renovation.

How financial incentives can prioritise vulnerable and energy-poor households

The French government ended its tax credit support for renovations in 2019 because of its regressive impact, replacing it with the MaPrimeRénov' program — a revenue-based grant that provides higher support for lower-income households. Applying revenue-based parameters and using grants that limit up-front costs significantly improved the distribution of aid. However, energy savings



Source: Graphique 8 : économies d'énergie 2020-2022 générées par les travaux aidés par MaPrimeRénov', par déciles de niveau de vie* des ménages occupants



Source: Tableau 6: montant moyen des travaux, des aides MaPrimeRénov' et des CEE déclarés en 2023, taux de reste à charge avec MaPrimeRénov' et avec l'ensemble des subventions selon les déciles de niveau de vie* des ménages bénéficiaires

generated have increasingly concentrated in higher-income households, while the lowest income groups are losing relative ground.

And while in 2020, the bottom 10% of households accounted for nearly 7.7% of the energy savings, the 4th and 6th income contributed 20.2% and 18.1%, respectively The distribution of energy savings flattened with the opening of the income ceiling. The opening of the income ceiling resulted in significant gains in higher-income groups and the share of savings in the highest income group increased by 3.5 times.

In 2023 average amount of support per income group decreased; the average support in the richest income groups was still significant. At the time, the amount spent globally on renovation projects sharply increased in the richest two income groups.

Despite the higher level of support for the poorest households, their realised energy savings remain lower. This suggests that while increasing subsidy rates is essential, it does not work miracles: middle- and higher-income households are consistently better able to plan, finance, and complete renovations, capturing a disproportionate share of the benefits. Closing this implementation gap requires revenue-based grants – along with full up-front costs coverage for the poorest households, which can be financed by decreased support for higher income groups through the introduction of income ceilings on renovation subsidies.

See also *Policy example I: Habitat for Humanity Hungary's revolving fund* to cover up-front costs program, which established a revolving fund to cover upfront renovation costs and thereby make state support accessible.

Common Barriers for Low-Income Households

Low-income households face disproportionately high barriers to renovation:

- Lack of savings and access to credit;
- Higher investment needs (e.g. fixing structural issues like obsolete wires, leaks, cracks, accessing water and sanitation or construction of central heating system);
- Greater housing cost burden (e.g. in Hungary 25.1% of disposable income for those earning <60% of median income vs. 12.5% average);
- Lower access to information and administrative support;
- Legal and administrative insecurity in informal or precarious housing.

Figure 1 (p.22) shows in detail financial barriers by type, along with recommendations to overcome them.

Barriers to incentives and recommendations

Barrier Type	Examples	Policy Recommendations
Financial	Mismatch of incentive expectations and household financial realities Low household debt tolerance Inability to leverage tax credits due to limited tax liability	Consider incentives based on need- or climate risk-based approaches and structure incentives as grants Public entities partner with utilities to advance zonal decarbonization in neighbourhoods where households have limited capacity to leverage debt and tax-based incentives
Organizational	Limited project management capacity in self-managed buildings Additional costs associated with expert review and oversight of projects Language access barriers	Resource and provide robust technical assistance to building owners and residents for project scoping, financing, management, and review Dedicate interpretation services to subsidized projects
Historical	Deferred maintenance creates extra project costs that are not subsidized, an issue that is more pronounced in historically disinvested neighbourhoods Oil-fueled buildings do not qualify for natural gas utility rate-payer-funded incentives	Provide gap financing or funding to address the project costs of deferred maintenance Supplement programmes for buildings that are systemically underfunded by utility-administered programmes
Institutional	Differing eligibility requirements make bundling contracts challenging Some contractors uninterested in working on smaller projects	Support efforts to bundle contracts for greater economies of scale for households and preferable construction contract terms for labour

Source: Wagner and de Valle: Cooperating Through Transition: Limited-Equity Cooperatives, Climate Finance, and Multi-Family Decarbonization in NYC, 2025, Journal of City Climate Policy and Economy

In Hungary, these challenges are particularly acute:

- According to Hungary's National Energy Strategy (2015), most households lack sufficient savings to finance large-scale renovations.
- Central Statistical office data from 2020 shows 34.8% of Hungarians struggle to cover unexpected expenses.
- The lowest income decile has negative net assets, meaning their debts exceed their assets — making coverage of up-front costs impossible.
- In recent years, Hungary's **energy efficiency obligation scheme** benefited more industry than households. While recent updates might incentivise investment in residential buildings, it's unclear to what extent these mechanisms will lead to the prioritisation of complex, residential renovations.
- In the worst-performing buildings, renovation needs are often urgent and crisis-driven, further increasing cost and planning challenges.

Current Gaps in Funding Schemes:

- Most energy efficiency schemes do **not specifically target** low-income households.
- Even targeted schemes often require **upfront payments or proof of solvency**, which the poorest cannot meet.
- Tax-based support schemes have a regressive distributional impact.
- **Non-refundable public subsidies without income-based targeting and/or requiring upfront payments** often predominantly benefit households that could access private finance.

Appropriate financial measures:

- Assess the financial situation of households and
- The total cost of renovation of their homes, including structural corrections prior to energy efficiency improvements.
- Ensure that **100% of renovation costs are covered upfront** for the lowest-income households through subsidies. If this sounds too much, consider that investments in fixing housing inadequacies pay off within 1.5 years, and investing in energy efficiency among the poorest households has the highest savings potential.
- Provide **sliding-scale grants and loans** for others, based on income levels;

To be implemented carefully: on-bill financing excludes households that rely on solid fuels (the majority of poorest households in many Central and Eastern European countries) and can put a high burden on household budgets if energy savings are based on energy certificates and projected savings, not on actual energy use

To be avoided:

- Ex-post financing subsidy schemes that exclude low-income households due to lack of savings or creditworthiness.

- Income-tax based support schemes as they are regressive and provide the highest support for those who need it least. As mentioned earlier, in France, a tax-credit scheme was eliminated due to its regressive impact. In addition, analyses of the US tax credit scheme for energy transition and the Italian Superbonus, revealed similar shortcomings.

Financing schemes must be:

- Long-term and predictable to allow planning and market stability;
- Using inclusive allocation criteria for low-income, vulnerable households;
- Accessible without credit checks or ex-post reimbursement models;
- Prioritised for vulnerable groups, with earmarked 100% upfront subsidies.

The NBPRs need to include:

- Total investment needs (2030, 2040, 2050);
- Budget breakdown by public/private sources and budgetary resources
- Planned budget and funding sources for proposed policies and measures listed.

To make the financial aspect of renovation plans better, NBRPs should include:

- Detailed assessment of the costs of renovations, including
- Structural measures (fixing leaks, cracks, obsolete electrical installations, access to water, installation of central heating etc)
- Efficiency measures
- Climate-proofing measures
- Access to renewable energy
- Soft measures (reaching out to households, technical, and administrative support)
- Assessment of the financial situation of households to tailor the offer of grants and loans to their needs.

Policymakers should ensure:

- Funding schemes account for structural inequalities.
- Public subsidies do not flow to households that are able to renovate through private financing;
- Residents with informal tenure status receive support in legalising their housing, ensuring they can access renovation assistance and that precarious housing conditions are not excluded but prioritised in renovation programs.

Examples and Good Practices

- MaPrimeRénov Sérénité (France): Up to 70-90% costs covered for low-income households, paid directly to contractors. The highest support is provided for the poorest. As remaining contributions still pose a prob-

lem, schemes like Stop Expulsion Énergétique provide additional funding.

- Slovenian Environmental Public Fund: Provides accessible public financing for low-income households on cash social assistance or welfare benefits.
- UK Energy Company Obligation (ECO): Mandates obligated entities to deliver savings in fuel-poor homes, including rural areas and worst-performing stock. Evolved into a multi-measure retrofit approach.

Funding Sources

Member States are using, and could further use, different types of funds, but they need to ensure that vulnerable households are prioritised when spending them. Key instruments include the Recovery and Resilience Facility

- Social Climate Fund
- Cohesion Fund
- InvestEU
- Auctioning revenues from the Emissions Trading System (ETS)
- Just Transition Mechanism
- ERDF + ESF+

These instruments must be mobilised to eliminate upfront cost barriers and support deep renovations in the lowest-income households.

Policy-Maker Checklist to comply with the prioritisation of vulnerable households with financial measures

- [ ] Provide upfront 100% subsidies for the lowest-income households, along with tailored technical, administrative support.
- [ ] Design sliding-scale grants and loans proportionate to income levels.
- [ ] Avoid ex-post reimbursement for low-income households and tax-based schemes in general if they are potentially regressive.
- [ ] Prioritise the worst-performing buildings and substandard housing, with additional support to fix inadequacies.
- [ ] Include informal and precarious housing in renovation targets.
- [ ] Ensure long-term, stable financing schemes.
- [ ] Mobilise EU funding sources and allocate them proportionally to the lowest-income groups.
- [ ] Justify the allocation criteria and demonstrate how funding is directed to those most in need, taking into account their financial situation.

Technical assistance should be tailored to the needs of vulnerable households, particularly those living in unfit housing, where structural improvements are needed prior to energy efficiency measures. Learn more about adequate technical assistance through Habitat for Humanity Hungary's integrated renovation services, where technical, administrative and financial assistance are provided together.

Safeguard #3 Designing integrated financing schemes which provide incentives for deep renovations and staged deep renovations, pursuant to Article 17;

This point is addressed in the dedicated section on policies and measures of the NBRP and is discussed on page 16. (d) removing non-economic barriers, including split incentives;

While split incentives have been widely addressed , we suggest that when public funding is provided to landlords for renovations, social safeguards should be in place to affordable rents and secure tenures after renovation. Requiring landlords to report actual energy cost savings can help define a fair rent-increase threshold, keeping renovations cost-neutral for tenants. Partial warm rent control can further promote energy saving renovations by landlords, while maintaining an incentive for tenants to reduce energy consumption without undermining energy affordability.

Safeguard #4: Monitoring social impacts, in particular on the most vulnerable households.

Article 9(4) (e) of the Directive mandates that monitoring the social impacts of implementation must be part of Member States' efforts to ensure compliance with minimum energy performance standards. As such, the impact of energy efficiency regulations should be regularly assessed to ensure that the policies introduced do not create further social inequalities. Data collection and feedback systems integrated into the activities of local social services should be used to verify that the measures effectively benefit those in need.

Monitoring of social impacts could include:

- Impact of energy efficiency requirements on housing costs, including the affordability and size of housing available to the lowest-income groups.
- Impact of renovations on local populations, particularly whether renovation programs risk displacing vulnerable populations
- Distribution of funding, assessing which income groups access public support and whether funding reaches those that need it most.

The Justice in 100 scorecard provides guiding questions to assess the extent to which policies prevent gentrification and displacement (See next page).

As the energy transition is expected to bring about a wide range of technological and digital solutions, special attention will have to be paid to bridge the digital divide and ensure the inclusion of segments of the population that do not have access to smart technology and online services. Digital tools should be used to increase the efficiency of customer service, but they must not fully replace in-person administrative and technical assistance.

To ensure that the implementation roadmap of the NBRP is responsive to the needs of vulnerable households, an inclusive public consultation process should take place during the drafting of the national building renovation plan.

Figure two

Advances anti-gentrification and anti-displacement[55]

- Does the law connect 100% policies to anti displacement policies and include anti-displacement provisions?
- Anti-displacement provisions include, but are not limited to:
  - "Renter protections, a right to return if improvements are made, and a community preference prioritizing surrounding communities for affordable housing developments that may include renewable energy and energy efficiency"[56]
  - Protections for land- and home-owners who are being pressured by developers to sell their property
  - Requiring "stipulations on any public funding for 'green development' or subject remediation of sacrifice zones [areas where health is sacrificed due to close proximity to polluting facilities] to local planning ordinances to ensure against gentrification or family displacement"[57]

Source: Justice in 100 Scorecard p.37

Moreover, to maximise the positive social impact of renovation programmes and avoid unintended negative consequences, the safeguards outlined in the Directive in relation to MEPS should not be restricted to those standards alone, but should apply to all renovation policies targeting the residential sector

Having addressed the social safeguards necessary for renovation programmes, we now turn to the next element of the NBRP template.

Monitoring of social impacts: Policy considerations

As required by EU directives, the national building renovation plan should ensure that at least 55% of the reduction in average primary energy use in the residential sector is achieved by renovating the 43% worst-performing buildings. It is important to mention that this 43% covers a very wide range of buildings, among which there are considerable qualitative differences. In practice, the energy savings target can be met by focusing on buildings at the upper end of this range, which are still relatively efficient despite falling within the worst-performing group. As a result, the 55% energy savings can be achieved by targeting the so-called 'low-hanging fruit,' rather than the most severely deteriorated buildings. This approach, however, dismisses the most problematic buildings that are most in need of renovation support, going against the 'no one left behind' principle. Since low-income households most in need of financial and technical assistance are typically the predominant residents of these dwellings, it is unlikely that their housing disadvantage can be significantly reduced without external intervention.

4.3. The promotion of deep renovation of buildings, including staged deep renovation

Getting back to NBRPs template, these sections discuss that staged deep renovation can be a solution to address high upfront costs and hassle for the inhabitants that may occur when renovating 'in one go'. It can also allow for less disruptive and more financially feasible renovation measures – especially if paired with longer compliance paths and extended timelines for owners to complete works. Public authorities can steer renovation priorities in this direction by providing technical and/or financial support not only for the construction work itself but also the preparatory phases of energy efficient renovations, such as technical inspection, energy auditing, and advisory tools - that can serve as a roadmap for planned, staged and complex retrofits rather than partial, standalone solutions. This is most effective if paired with setting up accessible and transparent advisory tools and assistance instruments such as one-stop shops that provide integrated energy renovation services or facilitators, as stated in Recital 62 of the EPBD. One-stop shops should tailor their services to the different needs of households. Quality advisory services, along with adapted financing schemes, can help plan and facilitate staged renovations that avoid lock-in effects or the built-in of inadequate measures (like too small or large heating capacity), while ensuring high energy savings in line with the #EE1st principle.

In line with Article 3 of the Energy Efficiency Directive, we recommend the integration of the energy efficiency first (EE1st) principle into the design processes of building renovation strategies and investment decisions. The essence of the #EE1st concept is that energy decisions, whether policy, regulatory or infrastructure investment, should always be preceded by an examination of demand-side resources and, where more cost-effective, should favor energy demand reduction over building new capacity. In developing the NBRP, it is therefore essential that measures are preceded by a mapping of end-user, i.e. demand-side, resources and a systematic consideration of whether it is indeed more cost-effective to build new capacity than to reduce the energy demand of existing stock.

4.4. Empowering and protecting vulnerable customers and alleviating energy poverty, including policies and measures pursuant to Article 24 of Directive (EU) 2023/1791, and housing affordability

The NBRP template requires member states to describe policies and measures aiming to empower and protect vulnerable customers and to alleviate energy poverty, all this pursuant to Article 24 of the Energy Efficiency Directive, which obliges Member States to take the following actions:

4.4.1 Target groups and definitions

Protect and empower people affected by energy poverty, vulnerable customers, low-income households, and social housing residents. Definitions of 'vulnerable customers' must be consistent with EU energy market directives and take final users into account.

Key issue: The share of energy-poor households is the basis for delivering a proportional share of energy savings under the Energy Efficiency Directive (EED).

If energy poverty is underdiagnosed, fewer households will benefit. Conversely, overly complex metrics risk creating excuses such as 'we don't know who is energy poor,' which delays action. At the same time, weak protection measures and burdensome administrative procedures for vulnerable consumers keep registration rates low, which can lead to an underestimation of the problems and prevent households from receiving real protection. Below we will show how energy poverty and vulnerable consumer protection measures fail to capture the extent of energy poverty and to provide adequate protection. This will be followed by recommendations.

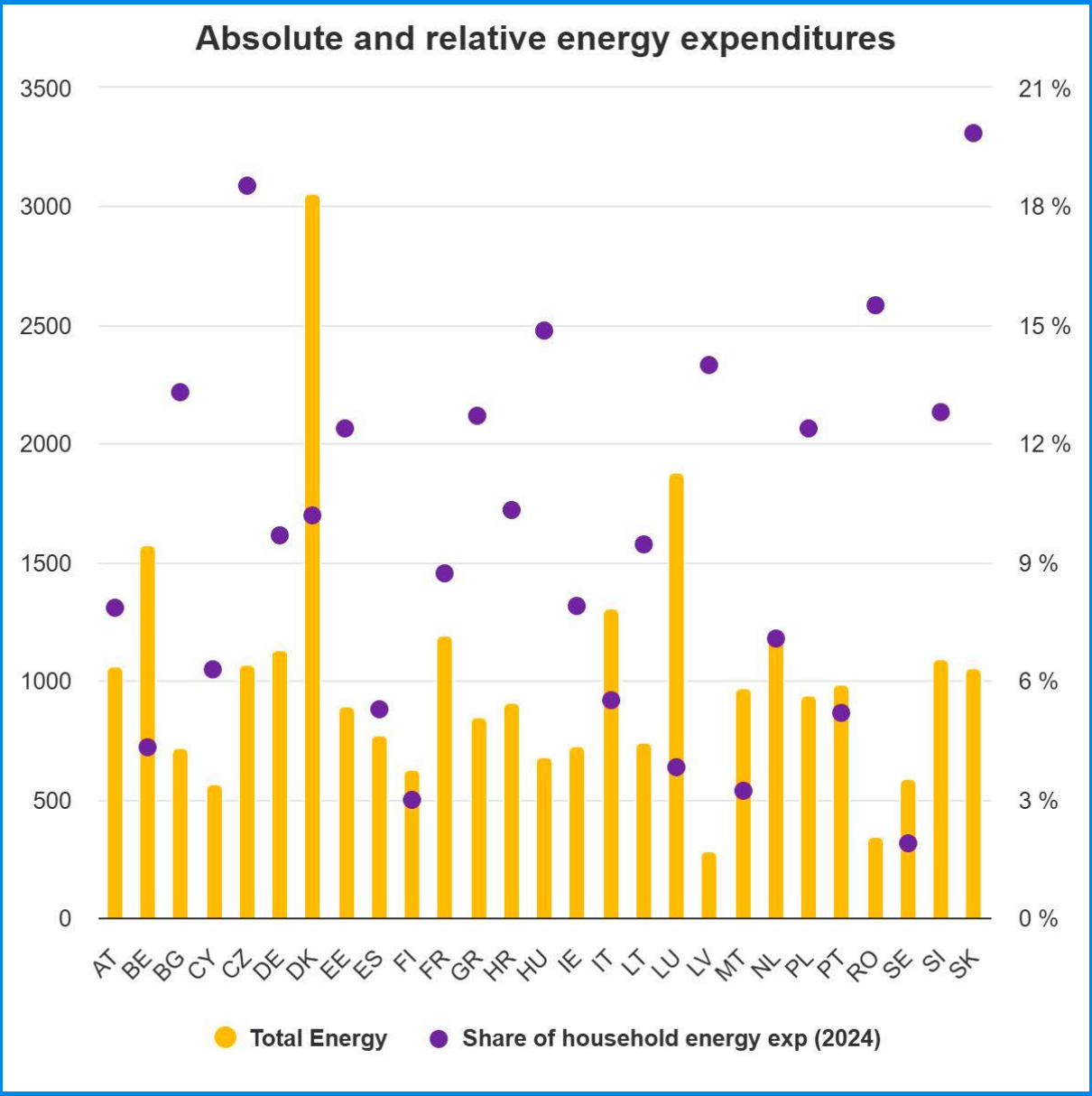
Energy poverty

In Hungary, the widespread incidence of energy poverty has been an issue since the 1990s. In response to the high number of households struggling to cover their energy bills, the government launched its 'utility reduction' campaign in 2013, resulting in the introduction of state-regulated prices for certain utility items instead of market-based tariffs. As a result, the price of electricity, gas, and water was reduced and has remained unchanged between 2013 and 2022. Although the utility reduction campaign remains the single most important public instrument aiming to mitigate energy unaffordability, it has yielded highly controversial effects, such as higher savings for wealthier groups. Despite the low energy prices, Hungarian low-income households spend the 4th highest share of their income on energy in the EU, as seen in the chart below. This reflects the combined impact of low household incomes and widespread inefficiencies in the housing stock.

The Hungarian National Energy and Climate Plan (NECP) states that '[a]ccording to the Government's policy, the result of the overhead protection system [utility cost reduction system] is that the proportion of energy poor is 3%, with about 300 000 people.' However, this contradicts EU-SILC data, which places the figure at 8%. In addition, both the number of households with utility debt and the share of homes with damp walls are higher. The Hungarian legal terminology and the strategic frameworks on energy efficiency operate with a restrictive definition of energy poverty. The Hungarian Energy Efficiency Law sets the threshold at 25% of annual household expenditure on energy use to be considered energy poor or eligible for additional support. This is a shockingly high threshold and considerably above what is considered a high household expenditure on energy in other Member States.

The statements and policy measures outlined in the NECP, Recovery and Resilience Plans and the last Long-Term Renovation Strategy (LTRS) are restrictive and overly general in their current form and will need to be radically improved in national building renovation plans. They do not adequately address energy efficiency and energy poverty, and the energy poverty reduction objectives are not nearly ambitious enough. The strategic objectives of the previous LTRS only superficially addressed measures for residential and public buildings. While a milestone has been set for the reduction of final energy use of buildings by 2050 (compared to the 2018-2020 average), there are no concrete figures regarding the number of buildings to be renovated or the expected cost implications.

Hungary has one of the lowest energy prices in Europe. Still, low-income households spend among the highest shares of their income on energy in Europe.



Dashboard for household energy expenditure, 2024

Energy vulnerability is a multidimensional phenomenon that manifests differently across households. It cannot be reduced to a price issue alone, nor effectively addressed by intervening in a single variable, such as the cost of energy. The severity and forms of energy deprivation are contingent a variety of factors such as tenure and building type, socioeconomic status, household structure, and spatially fixed determinants such as geographical location, building materials, and the types of energy infrastructure and appliances used in the home.

Vulnerable consumers

Hungary vulnerable consumers status can be required by socially disadvantaged people (social benefit recipients) or by people with disability.

Number of registered vulnerable consumers is low, likely because of the relatively high administrative costs of registration compared to the low level of help provided by the status (delay in payment, payment in instalment, prepayment meter and specific services for people with disabilities) for socially vulnerable consumers eligible for the status. Protection from disconnection applies only for consumers with disabilities whose health or life would be endangered by disconnection from the electricity supply. A significant share of electricity consumers had debt over 60 days, risking disconnections. The share of protected consumers is significantly lower.

Recommendations

- Define **vulnerable customers** in line with the Electricity and Gas Directives. Provide adequate support alongside streamlined administrative procedures, ensuring that households can easily register and access sufficient protection measures. If support is insufficient or processes are overly complex, many vulnerable households will not apply, leaving those most in need without assistance. Consider consumer protection measures for vulnerable firewood and coal customers.
- Define **energy-poor households** as required by Article 8(3), by considering the following indicators:
    - Inability to keep the home adequately warm (ilc_mdes01)
    - Arrears on utility bills (ilc_mdes07);
    - Poor housing quality (ilc_mdho01);
    - At-risk-of-poverty rate (ilc_li02, 60% of median income).
- **To capture multidimensional drivers of energy poverty properly**:
    - Reflect the combined impact of low incomes, high energy costs, and inefficient homes.
    - Consider using the low-income - low energy efficiency indicator in addition to or instead of the low-income high-cost indicator.
    - When using the low-income high-cost indicator:
    - Set a reasonable threshold that is not excessively high,
    - Include costs of non-utility-based fuels, like coal, firewood, oil or peat
    - Use cost-to-income ratios rather than simple energy price statistics to assess affordability, including residual income after paying energy bills.
    - Monitor all household fuel types (including firewood and coal), as these are primary energy sources for the poorest households in CEE but often excluded from price monitoring.

- **Strengthen data collection and reliability**:
    - Prioritise the use of objective indicators when available over self-reported indicators, use administrative data to validate the reliability of self-reported data on utility debts. For example, utility regulator data on arrears, risk of disconnections, and actual disconnections show more precisely the problem of indebtedness and disconnections than EU-SILC self-reported survey data that may underreport debt due to stigma.
    - Track the number of low-income households in the least efficient buildings to inform targeted renovation subsidies and investment planning.
    - Involve national banks to assess the financial situation of households to effectively design support schemes.
- **Set measurable targets**:
    - Based on robust assessment, establish realistic and quantifiable targets for reducing energy poverty and monitor progress through: Define how many households will benefit, by when, and through which measures.
    - Link energy poverty reduction targets with renovation targets for worst-performing buildings
    - Vulnerable consumers
    - Design vulnerable consumer criteria and support measures that reflect the problems of consumers and
    - Target tariff-based support measures to low-income households. Avoid implementing universal price support measures (including price reduction) alone, as they will generate more savings for the higher-income groups

Adequate assessment of energy poverty is the starting point of effective, evidence-based policy making and contributes to the recognition of crucial issues

4.4.2. Priority on energy-poor households in energy efficiency

The EED requires implementing energy efficiency improvement measures and related consumer protection/information measures as a priority for these groups. Monitoring and reporting are required under Regulation (EU) 2018/1999.

Key issue: while both the EPBD and the EED emphasise the need to renovate worst-performing buildings, prioritise funding for low-income households and deliver a proportional share of energy savings for energy-poor households, in practice, current policies fail to reach these aims.

Hungary's Energy Saving Obligation Scheme (ESOS) was intended, according to the 2020 Long-Term Renovation Strategy, to deliver residential modernisations on a market basis without burdening households or the state budget. In practice, however, most savings have been achieved in the industrial and corporate sectors, with only limited measures for households (e.g. free attic insulation). Ob-

ligated parties are free to invest where savings are cheapest and fastest, which has led to underinvestment in complex residential renovations.

The EU Energy Efficiency Directive requires a proportional share of savings among vulnerable households. Hungary's Energy Efficiency Law initially ensured this by earmarking ESOS revenues for 'households to be supported.' After amendments, however, revenues can also fund public building renovations, eroding the only strong social safeguard in the EU Green Deal framework. This shift risks delivering efficiency targets while leaving energy-poor households behind.

The 2025 ESOS update raised obligations but, according to MEHI, regulatory adjustments alone are insufficient to stimulate deep renovations of poorly performing homes. Comprehensive measures — combining financial incentives, renovation support services, accessible information, and a skilled workforce — are required. The EKR catalogue must clarify how complex renovations (façade, attic, heating systems) will be combined, calculated, and implemented.

Recommendations

- For earmarking a proportional share of energy savings for vulnerable groups, it's crucial to define and monitor energy poverty accurately. If energy poverty is underestimated, only a small share of households will be identified as eligible, and consequently, only a limited volume of support and energy savings will be delivered. Adopt clear definitions and multidimensional indicators for vulnerable and energy-poor households, aligned with EU law (Articles 24 and 8(3) EED).
- Establish a dedicated monitoring framework to capture the distribution of energy savings measures and to ensure that energy savings measures reach vulnerable households proportionally.
- Link the monitoring framework with building renovations to track the energy savings through the renovation of the least performing buildings. This way, renovation efforts directed to the worst-performing buildings and efforts to deliver a proportional share of energy saving to vulnerable households can mutually reinforce each other
- The UK Energy Company Obligation (ECO) shows how dedicated targeting and transparent monitoring can work in practice: by focusing explicitly on low-income households in poor-quality housing, ECO reached over two million households and delivered measurable social and environmental benefits.
- By contrast, Hungary's Energy Saving Obligation Scheme (ESOS) has so far channelled most investments into industry, with only limited support for households. To align with EU requirements and prevent a silent erosion of equity, ESOS should be restructured to:
- Bind obligated companies to direct a defined share of investments toward complex renovations of low-income and vulnerable households' homes.
- Maintain strong social earmarking, ensuring ESOS revenues primarily benefit households rather than being diverted to public buildings.

- Ensure transparent revenue use, with public reporting on how many vulnerable households are supported and what energy savings are achieved.
- Frame reforms around wider co-benefits, including environmental, health, economic, and demographic improvements.

4.4.3. Mitigating distributional effects

Use energy efficiency measures to offset impacts from taxation (Article 10) or emissions trading in buildings and transport (Directive 2003/87/EC).

Key challenge: Carbon pricing has a regressive distributional impact as its burden is highest on the poorest households, despite that carbon emissions are significantly higher in the wealthiest groups. As the Social Climate Fund's budget is far from being enough to compensate for the negative impacts of carbon pricing on low-income households.

Recommendations

- Monitor distributional impact of carbon taxing for careful design of size of mitigation measures.
- Assess planned policies have economic, social, and health benefits that arrive in priority to marginalised communities to compensate negative impacts
- Deliver proportional share of energy saving measures, especially through building renovations resulting in cost savings to the lowest income households, is crucial. This needs proper financing that will be discussed in the next points.
- Carefully measure the delivered energy savings so that they effectively offset set negative impacts of carbon costs.
- Use ETS revenues to the largest extent possible to target the lowest-income groups.

4.4.4. Financing and funding

Maximise Union and national resources — including the Social Climate Fund and ETS auction revenues — to fund efficiency upgrades, prioritising early and forward-looking investments before wider distributional impacts occur.

Recommendations

This requirement provides an opportunity to mobilise the overlapping policy goals for the NBRP and SCP. Public funding often fails to reach low-income households due to the design of funds, including prerequisites, like up-front payments by households, creditworthiness, high revenues to benefit from tax relief and the list can go long.

4.4.5. Technical assistance and enabling tools

The EED requires Member States to provide support and deploy instruments such as on-bill schemes, loan-loss reserves, guarantee funds, and dedicated renovation funds (including deep renovations or minimum energy gains).

Recommendations

See section 4.5. Creation of one-stop shops for the provision of technical, administrative and financial advice and assistance

4.4.6. Access to finance

The EED requires member states to ensure that vulnerable groups can access grants, subsidies, affordable loans, and dedicated credit lines linked to minimum energy gains.

Recommendations

To facilitate access to funding:

- Maximise Accessibility Through Simple Processes: Design administrative procedures that are clear, streamlined, and adapted to the needs of the target population, ensuring everyone can participate with ease.
- Ensure Full Affordability by Covering Upfront Costs: Structure subsidies to remove financial barriers at the start, so households can benefit immediately without needing significant personal resources.
- Enable Participation with Inclusive Eligibility: Create eligibility rules that reflect the realities of low-income households, making support available regardless of credit history, debt levels, or employment type. Use revenue-based criteria as suggested by the EPBD to prevent the access of income groups that can finance renovation by their own means and private finance to limited public money
- Design Progressive Support Mechanisms to benefit low-income households: avoid tax-based support, as low-income households will hardly benefit from it, while the highest income groups will easily take the most out of it.

See more on this under the sections on:

- Appropriate financial measures:
- Recommendations for Inclusive Financing
- Examples and Good Practices

4.4.7. Consumer empowerment

Article 24 of the Energy Efficiency Directive, to which NBRPS templates should be aligned, requires member states to support social actors in promoting engagement of vulnerable customers in energy markets and encouraging sustainable consumption behaviour.

Recommendations

For vulnerable consumers, participation of energy markets should serve their interests and participation options should be aligned with their needs and situation.

Examples of meaningful participation can be:

- Benefit-sharing schemes, like the pass-on of excess renewable energy to vulnerable consumers. Octopus Energy in the UK already provides such scheme
- Community heat networks in underprivileged settlements, with a high share of polluting heating methods, can provide cleaner heat for consumers without requiring the individual installation of heat pumps and related massive renovations. Swaffham Prior Heat Network, deliversm reliable, renewable heat from 2022, replacing oil boilers.
- As mentioned above, lowest income groups carbon emission is lower than high income groups, and while information on sustainable consumption measures can contribute to savings, structural measures are more benefical, as often high energy costs are due to structural problems of the home, rather than careless behaviours.

4.4.8. Expert networks

Article 24 also requires the establishment (or assign to) cross-sectoral expert networks (health, building, social sectors) to advise national/local decision-makers. These EED mandates that the networks should be gender-balanced and inclusive, and may provide guidance on:

- national definitions and indicators of energy poverty and vulnerable customers;
- development of data sets and monitoring tools;
- strategies for affordability, housing cost neutrality, and ensuring that public investments benefit both tenants and owners;
- measures to address disproportionate impacts on groups at risk (e.g. based on income, gender, health, minority status, or demographics).

Recommendations

- Carry out a meaningful consultation process when preparing the NBRS, reaching out to the population impacted by energy poverty
- Include people with lived experience in the expert groups, with guarantees to dignified, meaningful and supported participation.

The JUSTICE IN 100 SCORECARD (see page 38) provides examples on how to ensure meaningful participation. Adapting its guiding questions to national realities can help design inclusive consultation processes.

Part 1	**Process:** Have marginalized communities participated meaningfully in the policymaking process with sufficient support?	
LINE	**ELEMENT**	**POINTS (0 = No 1 = Yes)**
Drafting Legislation		
1	Community leaders report that direct outreach and meaningful participation in law-making effort occurred for the public and marginalized communities, including accessible meetings	
2	Community leaders report that relevant information and other resources were provided to the public and marginalized communities to sufficiently evaluate the proposed legislation	
Procedural Elements in Enacted Law and Rule-making		
3	Commits to principle of free, prior, and informed consent; requires consultation with Indigenous communities	
4	Mandates significant outreach for public and marginalized community participation in rule-making efforts, including accessible meetings	
5	Provides relevant information, financial compensation, and other necessary support to participate in rule-making proceedings	
6	Incorporates a mandatory and funded structure of governance, oversight, evaluation, accountability, and follow-up in response to public engagement	
7	Creates dedicated program(s) for advancing diversity, equity, and inclusion in hiring and other operational practices within energy rule-making agencies	
8	**Part 1: Process - Total Points** (add lines 1-7 and enter total)	

Source: Justice in 100 Scorecard page 13

4.4.9. Implication for NBRPs

When reporting under Annex II EPBD, Member States should align renovation strategies with EED Article 24 obligations, demonstrating how building upgrades and funding measures both directly alleviate energy poverty while safeguarding housing affordability. With the mindful combination of and adequate elaboration on these measures, the National Building Renovation Plan can be a powerful vehicle for designing and implementing renovation strategies that empower low-income and energy-poor households to participate in and benefit from the energy transition—particularly those who may otherwise be disproportionately impacted by rising energy prices or carbon pricing. Further recommendations to make the most out of NBRPs in terms of energy poverty alleviation:

- Ensure that renovation and decarbonisation programs are implemented equitably among marginalised groups and do not put financial or other burdens on them.
- Earmark funding to deliver renovation programs targeted at people in energy poverty
- Ensure that energy-poor households benefit proportionally from energy savings measures, as the EED requires. Ensure that energy-saving obligation schemes reach the homes of low-income group ideally through home renovations.

4.5. Creation of one-stop shops for the provision of technical, administrative and financial advice and assistance

Beyond financial difficulties, many households face several non-market barriers that prevent them from undertaking energy-efficient updates. The most cited constraints a lack of accessible information and awareness of the benefits of deep retrofits, difficulties navigating complex grant application procedures, challenges in finding trustworthy contractors, and uncertainty about hidden costs and risks. To make building renovation grants truly accessible, the communication and application processes must be simple, transparent, and easy to navigate. Vulnerable households in particular should have access to tailored guidance and support services to help with paperwork, contractor selection, and project oversight. Financial assistance should therefore be combined with direct legal, administrative, and technical support to ensure effective uptake.

Article 18 of the EPBD addresses these challenges by mandating that Member States establish an expansive network of one-stop-shops (OSS) for building energy performance. These one-stop shops are designed to serve as centralised advisory hubs, offering households integrated support throughout the renovation process. By assisting with grant applications, financing, technical solutions, and implementation, OSS ensures that residents can access all relevant expertise in one place.

This integrated approach not only improves awareness of financial options but also reduces the risk of poor decision-making, making deep renovations more manageable and effective.

In setting up these facilities, extra measures must be taken to ensure that households affected by energy poverty and those living in the worst-performing buildings receive dedicated services. These should include administrative support and active accompaniment throughout the renovation. It is recommended that the NBRP outline funding that allows low-income clients to have access to these advisory services free of charge.

Policy example I: Habitat for Humanity Hungary's revolving fund to cover up-front costs

A great example of this integrated approach is the programme launched by Habitat for Humanity in Hungary. They made the Hungarian Rural Family Housing Support programme— a government-funded home renovation scheme that normally excludes low-income families— accessible by creating and managing a revolving fund to pre-finance renovation costs. This fund helps households cover the financial gap created by the scheme's post-financing structure. HfHH also provides comprehensive social, administrative, and technical assistance. Local advisors proactively reach out to rural families to check eligibility and support them through the subsidy application process. Technical experts help plan the renovation and determine which interventions can be financed. Once the subsidy is awarded, HfHH covers the upfront renovation costs, a crucial step since payments are only disbursed after project completion. Local advisors also recommend trustworthy contractors carrying out the work. Finally, after the renovation is completed, HfHH supports the family in accessing the subsidy payment, which is then reimbursed to HfHH to sustain the revolving fund.

Policy Example II: Delivering Renovation as a Public Service – The U.S. Weatherization Assistance Program (WAP)

In the United States, the **Weatherization Assistance Program (WAP)** shows how energy renovation can go beyond One-Stop Shops and be **directly delivered as a public service** for low-income households.

Administered by the **U.S. Department of Energy** and implemented at the **state and local level**, WAP does not require households to coordinate works themselves. Instead, eligible households **sign up**, are assessed by local agencies, and then receive a **comprehensive package of energy upgrades** — such as insulation, heating system replacement, or air sealing — **free of charge**.

Key features:

- **No upfront costs or complex procedures** for the household
- Renovation works are managed and delivered by **certified local providers**
- The program also supports **job creation and local economic development**

Takeaway for National Building Renovation Plans:

For the most vulnerable households, especially those in or at risk of energy poverty, **publicly coordinated renovation services** can be more effective than standard support or voucher-based One-Stop Shops. Renovation as a **directly delivered service** ensures accessibility, quality, and impact.

4.6. The decarbonisation of heating and cooling systems

Gas-phase out in the EPBD

From 1 January 2025, no financial incentives are allowed for the installation of stand-alone fossil fuel boilers, except those selected for investment before 2025. (Article 17.15)

Member States must also strive to replace fossil fuel boilers, in line with their national phase-out plans (Article 13.7 of the EPBD). The 2040 phase-out target mentioned in the National Building Renovation Plans is not legally binding, but serves as an indicative milestone to help guide national policies toward full phase-out.

Role of gas in the Hungarian building sector

Phasing out fossil fuels is essential for the decarbonisation of the building sector, but it requires immense capital investment that low-income households cannot pre-finance. According to the Hungarian Energy and Public Utility Regulatory Authority (MEKH), 70% of households' final energy consumption is used for heating, and ⅔ of the energy used for heating and cooling in buildings still comes from fossil fuels.

Emission trading system

The primary instrument for the decarbonisation of the energy and transport sectors will be the extension of the EU emissions trading system to the residential sector. However, the increased costs of fossil-based fuels will ultimately appear in end-users' energy bills, resulting in significant social and distributional impacts that will further disadvantage vulnerable households who spend a larger part of their incomes on energy and transport. In its current logic, the ETS extension is shaping up to be a regressive and unjust mechanism, disproportionately affecting countries where a high percentage of households rely on coal, burdening households living in the worst-performing dwellings with the least financial opportunity to reduce the carbon footprint of their homes. Therefore, revenues from the ETS2 should be targeted to improve energy efficiency and facilitate the transition to clean and affordable heating sources, especially among low-income groups. NBPRs should be well elaborated and coordinated with heating and cooling plans and Social Climate Plans to facilitate the transition

From 2025, individual gas-fired boilers running on fossil fuels will not be eligible for state aid. While extending the ETS to the residential sector is intended to encourage the decarbonisation of heating by placing a carbon price on gas and heating, there is no guarantee that the 'polluter pays' principle will hold. Without safeguards, costs may simply be passed on to households in the form of higher overheads, making already under-consuming households even more vulnerable. Clear, high-visibility communication will therefore be essential on all developments affecting residential energy use, particularly the phase-out of fossil fuel-based boilers.

The decarbonisation of heating and cooling must be implemented in a way that does not compromise the basic energy needs and health of low-income house-

holds by increasing energy costs, for example, in situations where electricity tariffs are higher, or where buildings need energy efficiency upgrades first. However, in their current form, these initiatives do not clearly establish the necessary instruments and safeguards to ensure benefit to poor and vulnerable households. Leaving no one behind requires explicitly recognising and addressing the social risks constituted by climate measures in the context of housing.

As in other EU countries, the residential sector is the largest energy user in Hungary. As three-quarters of the energy consumed by households is used for heating purposes, and heating needs are predominantly met by fossil fuels, efficient transformation of this sector is key to achieving climate targets.

4.7. The deployment of solar energy installations on buildings

In line with the energy efficiency first principle, the effectiveness of solar energy systems should be maximised by ensuring that buildings undergo energy efficiency improvements—such as thermal insulation, electricity grid upgrades, and efficient lighting—before solar panels are installed. One way this can be encouraged is by linking solar installations to energy efficiency upgrades, mandating a certain minimum energy performance standard to be achieved prior to installing solar panels.

4.8. The improvements of buildings owned by public bodies

-including policies and measures pursuant to Articles 5, 6 and 7 of Directive (EU) 2023/1791;

Public bodies have a dual role and responsibility in facilitating a just energy transition. First, public services in general are essential for advancing social equity through social and economic policies and initiatives. Second, the public sector itself represents a significant share of a country's energy use through the energy consumption of the buildings it operates. In Hungary, the energy consumption of public buildings accounts for nearly 10% of the energy use of the domestic building stock. Based on the typology of public buildings developed for the National Energy Strategy for Buildings (2015), the largest energy consumers among public buildings are social service buildings, including healthcare institutions, and supported and temporary housing institutions such as homeless hostels and emergency accommodation. In countries like Hungary and Poland, homeless shelters are excluded from EU funding based on deinstitutionalisation goals. However, there is no framework for transitioning the shelter-based care system to housing-led solutions, which leaves shelter managers in a funding trap. The energy saving requirements for public buildings are dealt with under Articles 5-7 of the Energy Efficiency Directive, which mandate the annual renovation of 3% of total floor area of buildings owned by public bodies to at least NZEB or ZEB levels.

By retrofitting their own building stock, local governments and other public authorities can not only directly improve the living standards of occupants but also accelerate the energy transition and inspire further renovations. Long waitlists for municipality-issued rental housing are proof of the socioeconomic relevance and continuing high demand for social housing in Hungary. Howev-

er, to better support these vulnerable groups, municipalities and public welfare institutions require considerable national-level support in maintaining and improving their building stock. As such, it is important that the national building renovation plan provides clear details on the types and amounts of funding that will be made available for the retrofitting of publicly owned residential and non-residential buildings, as well as provide a framework for how the revenues saved from decreased utility bills following energy renovations can be allocated to further improve the energy performance of buildings.

At this point, we would also like to draw attention to the fact that in current strategies (LTRS and NECP), the sources of funding for the targets in the framework documents do not align with practical experience. Both strategies place strong emphasis on promoting energy modernisation in public and social service institutions through the Energy Efficiency Obligation Scheme (ESOS), introduced in January 2021. The ESOS is identified as the most important policy instrument to scale up Energy Saving Company (ESCO)-type schemes. According to the Hungarian LTRS, 'in the case of energy efficiency investments by the central budget and local governments, ESCO-based services minimise, or even render redundant, the use of budgetary resources and EU grants. As a result, Hungary intends to rely heavily on this scheme in the future, thus contributing to a more rational use of the shrinking funds in the 2021-2027 programming period' (Hungarian Long Term Renovation Strategy, 2020 p. 53).

In practice, however, project implementation has shown the opposite. Municipalities have not preferred ESCO schemes, largely because of the high availability of EU grants, which so far have been mostly non-reimbursable. A further barrier to the uptake of ESCOs is that the payback period for public building upgrades, which is a minimum of 10 years Since the ESCO agreements concluded so far have had a maximum duration of 15 years, public entities are often required to co-invest in projects of this length or longer, which raises the risk of indebtedness. In its current form, the ESOSs, in the public and residential sectors, have not been a viable option for financing residential and public building retrofits. The solution to this would be to extend ESCO contracts, coupled with tailored grants and the fine-tuning of energy-saving obligations schemes to support public and residential buildings renovations. Aggregation of public building renovations could also improve the attractiveness of these buildings, either for ESCOs or the ESOS.

4.9. Addressing skills gaps and promoting education, targeted training, upskilling and reskilling in the construction sector and energy efficiency and renewable sector

The EPBD mandates that the national building renovation plan provides an assessment of existing and projected capacities in the construction, energy efficiency and renewable energy sectors, while also addressing potential market barriers and failures across financial, technical, administrative, educational and human resources aspects. One of the multiple benefits of the clean energy transition is an increase in new job opportunities. Therefore, in addition to capacity assessment, an ambitious NBRP should set out intended actions to address the identified skill gaps and market deficiencies. Depending on the dominant eco-

nomic sectors regionally, this can be done through a wide range of educational and labour policies, as well as employment and training initiatives, such as:

- Integrating energy efficiency and renewables into vocational curricula and training offers of active employment services.
- Providing opportunities for apprenticeships through PPPs and public work programs
- Creating upskilling opportunities through gradually attainable certifications
- Developing training programmes for unemployed workers, especially for workers in industries negatively impacted by the transition to clean energy
- Member States are actively encouraging under-represented groups to train and work in the construction and building sector

With respect to vulnerable and marginalised groups, it should be emphasised that training and awareness programmes do not have to be limited to employment schemes but can expand to additional skills-development and empowerment programmes. These can encompass debt and arrears management services and awareness raising, as well as training opportunities to increase residents' financial and digital literacy. Finally, in addition to providing secure and affordable housing, access to jobs is a fundamental part of tackling homelessness and poverty and must be seen as a primary vehicle for the socioeconomic integration of marginalised citizens.

4.10. Optional: Addressing the improvement of indoor environmental quality

When drafting measures for energy infrastructure development in the NBRP, it is necessary to understand energy poverty as a complex phenomenon. It is not only an affordability issue, but also a problem of limited access to good quality clean energy sources and the infrastructure needed to deliver them. This understanding should guide investments in energy efficiency and renewable systems.

Paragraph 2(h) of Article 3 of the EPBD mandates that NBRPs include 'an evidence-based estimate of expected energy savings and wider benefits, including those related to indoor environmental quality'. In better-performing homes, this means the upgrade of ventilation and HVAC systems and other technology-based interventions. However, often, solutions that increase IEQ are far from the reality of households that suffer the most from low IEQ. Solid fuels constitute a huge share of residential energy sources in Central and Eastern Europe and are predominantly used by low-income households. At the same time, the price of firewood has tripled in the last 10 years. A socially fair NBRP must acknowledge the specific needs of households that are not connected to gas or district heating systems and rely partially or exclusively on solid fuels for heating. In their case, inefficient stoves cause bad air quality, mould, rot and volatile temperatures. In Hungary, this amounts to a striking 20% of the population, who in most cases belong to the lowest income segment and therefore can only afford poor quality heating fuels, which can lead to adverse socio-environmental health effects.

4.10.1. Possible measures to improve indoor environmental quality:

- Switching to central heating, which often reduces damp and significantly reduces indoor air pollution from stoves
- Fixing drafty windows and doors to stop cold air from flowing in
- Promoting low-tech ventilation measures and providing information on the need for proper ventilation prevents the development of humidity and mould
- Introducing passive cooling technologies like shading, solar panels, where appropriate, reflective rood and plants, to reduce exposure to extreme heat

4.10.2. Good Practice: Revolving Funds for Firewood in Ág and Varga:

In the villages of Ág and Varga, revolving funds have been established for the purchase of firewood, enabling community-based management of local resources in a sustainable way. These funds are crucial in allowing families to buy firewood in advance, giving it time to dry, or to access already dried firewood that is cleaner, more energy-efficient, and less polluting. In the villages of Ág and Varga, revolving funds have been established for the purchase of firewood, enabling community-based management of local resources in a sustainable way. These funds are crucial in allowing families to buy firewood in advance, giving it time to dry, or to access already dried firewood that is cleaner, more energy-efficient, and less polluting. This approach also helps prevent households from resorting to cheaper but more harmful alternatives to wood.

This report is published thanks to the support of the European Climate Foundation

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

www.feantsa.org

Follow us
/FEANTSA_ORG

Like us
/FEANTSA

Follow us
@FEANTSA

Connect with us
FEANTSA