

FEANTSA Response to the AccelerateEU Toolbox – Affordable and Secure Energy through Accelerated Action

We welcome the recognition of the social impacts of the energy crisis and the acknowledgement that fossil fuels, particularly gas and oil, continue to dominate heating. This exposes households to global price volatility and underlines the need for timely and targeted measures to **protect the most vulnerable consumers**.

While the Toolbox recognises vulnerable consumers in the section on “rapid benefits,” the structural sections (particularly Section 3.1 on “clean energy and electrification” and Section 3.3 on “boosting investment”) **do not set out concrete, actionable steps to ensure that these households benefit from electrification, renewable energy, and increased funding**.

As a result, **the Toolbox falls short of its stated ambition to link temporary income support to long-term solutions** and to ensure that the benefits of decarbonisation are available for all. Without targeted support, vulnerable households will remain unable to decarbonise and will continue to face disproportionate exposure to future energy crises, while benefits will arrive to more affluent segments of the society, further exacerbating existing inequalities.

RAPID EMERGENCY RELIEF MEASURES

The Toolbox does well to highlight that rising energy costs are tightening household budgets and disproportionately affecting vulnerable consumers. Immediate support must be both timely and well-targeted. Solid fuel users represent a significant share of poorest households in low-income EU Member States, and solid fuel prices skyrocket in times of crises. While firewood burning is still a major contributor to renewable energy statistics, vulnerable households relying on woodburning are not protected, and firewood prices are not monitored. For the repository of good practices, planned by the Commission for April 2026, FEANTSA recommends:

- Including households with pre-paid meters in energy price support schemes through [emergency top-ups](#) and by [ensuring social tariffs for prepaid meters](#).

We welcome the guidance on consumer protection and disconnections planned for April 2026. This guidance should:

- Establish a clear [ban on disconnections](#), as implemented during the previous energy crisis in Austria, Spain, France, Germany, Belgium, Italy;
- Promote [support for energy debt relief and reconnections](#), as practiced by the National Energy Action (NEA) in the UK.
- Recognition of solid fuel users and expansion of vulnerable consumer protection measures to them,
- Consumer protection measures and fair tariff systems should be expanded to non-profit social service providers, including homeless services, who work with vulnerable populations but often not eligible to lower tariffs, thus pay the same rates as profitable businesses.

FINANCIAL INCENTIVES

We support the principle that temporary income support should be linked to long-term solutions. However, we are concerned about the proposed “targeted financial incentives.” Evidence shows that the proposed instruments such as tax credits and social leasing often fail to reach the most vulnerable.

Low-income households typically cannot benefit from tax credits. In France, renovation subsidies delivered through tax credits primarily benefited higher-income groups, while the introduction of upfront grants ([MaPrimeRénov'](#)) improved distribution, [the lack of 100% up-front cost support still excluded the poorest](#). Similarly, social leasing schemes for electric vehicles have [not significantly reached the lowest income deciles and provided highest benefit for the highest eligible income group](#)

- Financial incentives need to be proportional to household income – 100% upfront grants for the lowest-income households will provide quick and high return, and increasing private finance and repayment schemes with increasing income, will ensure mobilisation of private investment
- Art. 8(3) and 24 of the Energy Efficiency Directive (EED) and article 17(18) Energy Performance of Buildings Directive (EPBD) must be monitored and enforced to ensure that energy savings are implemented in priority among vulnerable households, and funding flows to them in priority.

ELECTRIFICATION

The planned Commission action on electrification, heating, and cooling in Q2 2026 is an important opportunity to ensure inclusiveness in the energy transition.

Electrification targets must be accompanied by measures reflecting the actual condition of buildings. While heat pumps improve efficiency in well-insulated homes, they can [increase costs in poorly insulated buildings](#). In the EU, around [16% of households live in dwellings with structural deficiencies such as leaky roofs or drafty windows](#), and approximately [132 million homes have outdated electrical wiring](#) presenting a fire risk.

Electrification policies must therefore:

- Pair heat pump deployment with deep renovation of substandard housing and upgrades to electrical systems;
- Include social electricity tariffs and support for small-scale solar installations;

In transport, decarbonisation strategies must prioritise households experiencing [transport poverty](#). Current [EV support schemes](#) largely benefit higher-income households, while investment in affordable alternatives remains insufficient.

Electrification of transport must also be linked to the expansion of affordable charging infrastructure, as [public charging](#) is often significantly more expensive than private options.

TAXATION

The phase-out of fossil fuel subsidies must be carefully managed to avoid exacerbating energy poverty. It should include income-dependent support for households reliant on fossil fuels for heating and transport, enabling them to transition to cleaner alternatives.

The forthcoming May 2026 proposal on network charges and taxation should explicitly integrate equity considerations and safeguards for vulnerable consumers.

RENEWABLES

Renewable energy deployment continues to [disproportionately benefit](#) higher-income households and regions. For example, [rooftop solar installations are concentrated among wealthier households](#).

Policies to expand renewable energy must ensure equitable access. This includes:

- Ensuring that the Geothermal Strategy for district heating and cooling systems using renewable sources include at least proportional targeting of vulnerable households; e.g. by replacing polluting firewood burning.
- Reinforcing solar and other benefit sharing requirements, targeted to vulnerable groups.
- Supporting community-based and small-scale renewable projects (e.g. [Lightbringers Foundation](#)).

BOOSTING INVESTMENT

We welcome efforts to mobilise EU funding, including cohesion policy resources, to respond to the energy crisis. However, funding must be effectively targeted.

The Commission's planned work from April 2026 to support Member States in maximising EU funds should go beyond the aim of mobilising private investment and must prioritise investments that directly benefit vulnerable households and deliver immediate impact for those that are not attractive for private investments

On simplification, while streamlining procedures can accelerate fund deployment, it must not undermine the ability to target support effectively. Public funding should maximise grant components for the most vulnerable while requiring higher co-financing from those with greater means.

Regarding the EU ETS, the planned July 2026 revision raises concerns about the continued prioritisation of industry in revenue allocation. Current proposals risk perpetuating a bias toward ringfencing funds for industrial use while only encouraging spending on households.

The Commission should provide clear guidance and enforcement mechanisms to ensure that ETS revenues prioritise vulnerable households, in line with Article 24(3) of the EED and Article 30(6)(d) of the ETS Directive.



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