



Euroconsumers' contribution to the Call for Evidence on the Housing Simplification Package

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Introduction

Euroconsumers¹ welcomes the opportunity to contribute its evidence to the European Commission's work on the Housing Simplification Package.

Our contribution draws on consumer research and practical experience from Euroconsumers and its member organisations Altroconsumo in Italy, OCU in Spain, Testaankoop/Testachats in Belgium, DECO PROteste in Portugal and Euroconsumers Polska in Poland, as well as the consumer-facing HORIS and CLEAR-HP projects.

The Commission's Call for Evidence seeks concrete examples of how regulation affects housing supply and affordability, evidence distinguishing EU requirements from domestic implementation, practical suggestions to reduce costs and delays, and examples relevant to productivity in construction and renovation.



From a consumer perspective, the housing challenge has **two closely connected dimensions**. The first is whether consumers can afford to access housing in the first place. The second is whether households can afford to maintain and improve the homes already available, particularly where ageing or inefficient properties require significant renovation. In this regard, **housing supply and affordability cannot be considered separately**.

Euroconsumers' submission focuses on this second dimension. This contribution therefore does not seek to address every determinant of housing supply. It focuses on the **consumer side of Europe's existing housing stock**: the costs and practical barriers households encounter when renovating, and the ways in which simplification can help existing homes remain usable, efficient and affordable.

This is an important complement to measures aimed at creating new housing supply. Renovating an existing home does not create a new dwelling, but barriers to renovation affect the cost and quality of housing already available. For a prospective purchaser, necessary renovation represents an additional cost on top of the purchase price. For existing owners, landlords and co-owners, high costs and difficult processes can result in works being postponed. Simplification can therefore contribute to maintaining and improving the housing stock Europe already has.

¹ **About Euroconsumers:** Gathering six national consumer organisations and giving voice to a total of more than 7 million people in Italy (Altroconsumo), Belgium (Testachats/Testaankoop), Spain (OCU), Portugal (DecoProteste), Poland (Euroconsumers Polska) and Brazil (Proteste), Euroconsumers is the world's leading consumer group in innovative information, personalised services and defence of consumer rights. <https://www.euroconsumers.org/>

1. Affordability must be the starting point

Euroconsumers' latest Consumer Affordability Barometer demonstrates the financial constraints under which households are making housing and renovation decisions.

The results for 2025 show that housing remains the leading affordability constraint for consumers in Belgium, Italy, Spain and Portugal. **48% of respondents in Italy report difficulty affording housing-related expenses, compared with 46% in Portugal, 42% in Spain and 29% in Belgium.** Meanwhile, 30% of consumers have difficulty paying gas and electricity bills, and more than half of respondents also expect their ability to invest to decline in 2026.²

Evidence from Spain illustrates the pressure associated with accessing housing. OCU's July 2026 Survey found that **39% of respondents to its housing-access module had received financial help from relatives or people close to them to access housing.** Among respondents aged 25–44, around half had received such assistance at some point.

These figures do not provide a complete picture of housing-access affordability, nor do they establish that regulation causes housing unaffordability. They do, however, show the financial context in which households are being asked to invest in their homes.

Large investments in insulation, windows or heating systems compete with mortgage or rental payments, energy bills and other essential expenditure. **The affordability of renovation therefore matters to the affordability of the existing housing stock:** the relevant cost to a household is not simply what it pays to acquire a home, but what it subsequently needs to spend to keep that home comfortable, efficient and in good condition.

In other words, **housing supply cannot be considered independently from the affordability of acquiring, operating and improving the homes that make up that supply.**

2 <https://www.euroconsumers.org/wp-content/uploads/2026/05/Affordability-Barometer.pdf>

2. Cost, uncertainty and complexity can make renovation of the existing stock more difficult

Evidence gathered through Euroconsumers' member organisations shows that home energy renovation is rarely one straightforward purchasing decision.

Consumer advice services report frequent requests for assistance concerning photovoltaic systems, heat pumps, solar thermal systems, battery storage and hybrid heating systems. Consumers seek help assessing quotations, comparing technologies, understanding expected economic benefits and identifying qualified professionals.

The **CLEAR-HP project**, involving Euroconsumers members Altroconsumo, OCU, Testaankoop/Testachats and DECO PROteste, provides particularly useful evidence of the barriers encountered by consumers considering heat pumps. The project identifies **high upfront product and installation costs, complex financing options, shortages of qualified installers, difficulties choosing the most appropriate option and unclear or misleading information about benefits and risks**.

Seven collective-purchasing campaigns attracted more than **23,000 consumer registrations and triggered 522 installations**. Follow-up work found that upfront cost was an important reason why interested consumers did not ultimately proceed. The project also identified additional difficulties for older homes, rented accommodation and multi-apartment buildings.³

National evidence illustrates the scale of the investments households may face. In Spain, OCU estimates that a package of wall, floor and window insulation for a **90 m² apartment in Madrid could cost around €6,000**. Its example allocates around €3,600 to wall insulation, €1,200 to floor insulation and €1,200 to two replacement windows.⁴

Testaankoop's Belgian work similarly illustrates how much the economics of renovation depend on the particular dwelling. High-performance glazing can cost around €500–€700 per m² installed, while indicative payback varies considerably according to the glazing and heating system being replaced.⁵

3 <https://www.euroconsumers.org/clear-hp-high-costs-cool-consumer-enthusiasm-for-heat-pumps/>

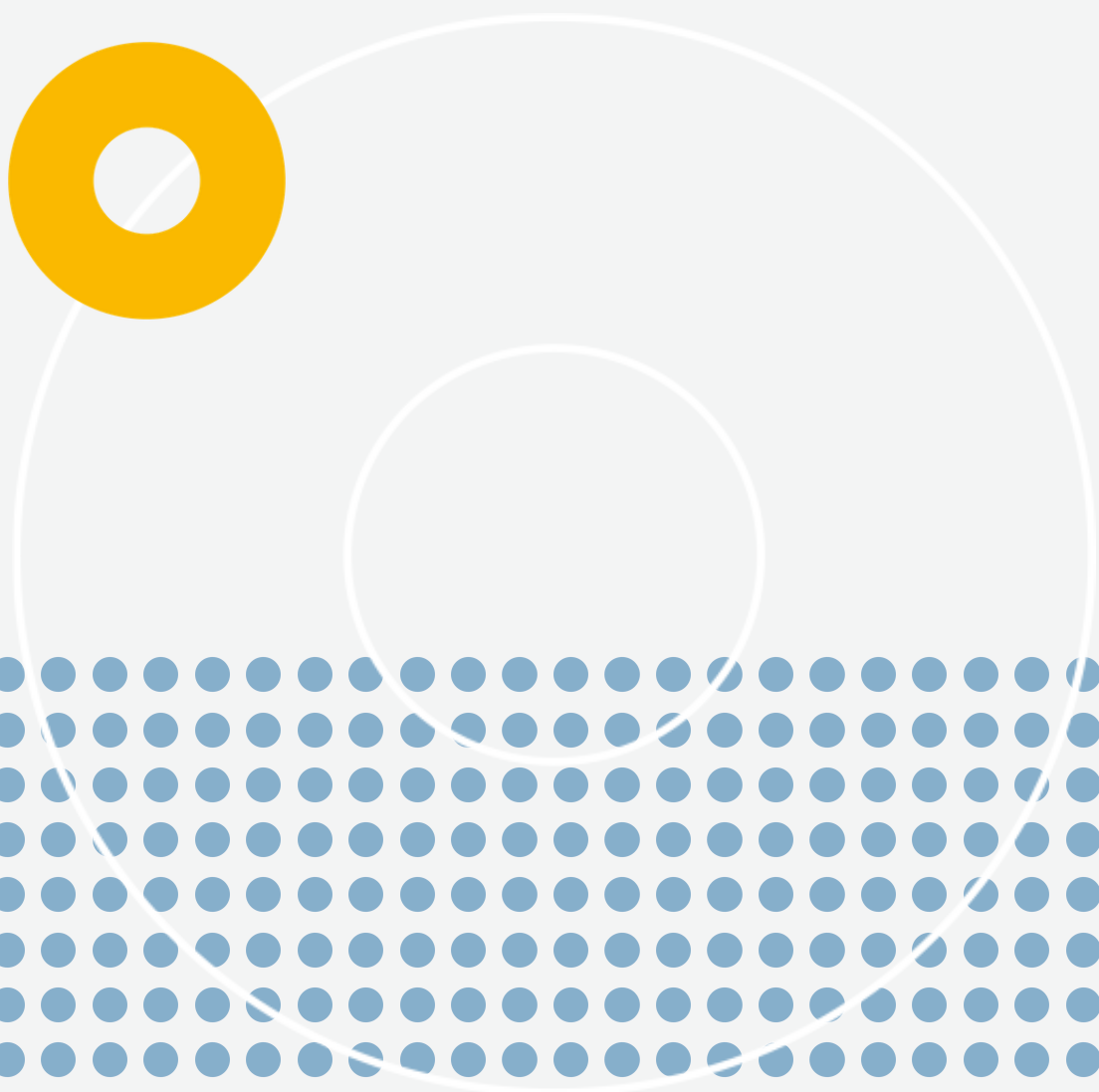
4 <https://www.ocu.org/organizacion/prensa/notas-de-prensa/2024/aislamientoacustico060924>

5 <https://www.test-aankoop.be/woning-energie/isolatie/dossier/glas-en-schrijnwerk>

These examples point to an important consumer problem: households need to understand not only whether a measure improves energy performance, but **what it will cost in their particular property, whether other works need to come first and what financial return they can reasonably expect.**

This is where renovation connects to the wider housing discussion. For a household considering an older or inefficient home, known or expected renovation needs form part of the real cost of that housing choice. For households already living in the property, difficult or unaffordable renovation can postpone improvements and increase the cost of keeping the home comfortable.

Euroconsumers' evidence therefore does not suggest that renovation policy can substitute for increasing new housing supply. It shows that **maintaining and upgrading existing housing is a distinct part of keeping Europe's housing stock usable and affordable.**



3. Simplification can reduce the friction surrounding renovation

Euroconsumers' experience also provides evidence of practical approaches to reducing these barriers.

Integrated consumer support

Through **HORIS – Home Renovation Integrated Services**, Altroconsumo, OCU and DECO PROteste have tested consumer-facing renovation one-stop shops in Italy, Spain and Portugal.

The platforms bring together functions that consumers would otherwise need to navigate separately: personalised renovation guidance, assessment of appropriate measures, expected comfort and energy and cost savings, information on grants and finance, and access to audited and trained professionals.

Across the three countries, HORIS has recorded **more than 470,000 visits, more than 10,000 completed home self-assessments, more than 1,700 quotations requested by 470 consumers and more than 140 registered professional service providers in its first twelve months.**⁶

The Spanish experience provides a useful country-level example: OCU's HORIS one-stop shop had already attracted **100,000 visits and more than 6,000 personalised simulations within its first eight months.** Among the most common enquiries were internal wall insulation and replacement of windows with double or triple glazing.⁷

The HORIS experience also suggests that information alone is not sufficient. Consumers need continuity from initial diagnosis through to qualified professional support, quotation comparison, financing guidance and follow-up. Strengthening the handover from digital advice to trusted professional services could help reduce search and coordination costs and support consumers in moving from initial interest to completed renovation.

CLEAR-HP tested a complementary model. Its collective-purchasing approach

⁶ <https://www.euroconsumers.org/horis-making-energy-renovation-simple>

⁷ <https://www.ocu.org/organizacion/prensa/notas-de-prensa/2026/horis060426>

combined consumer information with product selection, independent testing, negotiated purchasing and installation conditions and support during the purchasing process.⁸

Together, HORIS and CLEAR-HP show that renovation productivity is not only a question of what happens once builders or installers arrive on site. **Time and resources are also consumed before works begin**, while households identify suitable measures, look for trustworthy professionals, compare offers, understand available support and determine what is appropriate for their property.

Reducing that friction is therefore one practical dimension of simplification.

Stable and accessible support

Public support can materially alter whether a renovation is affordable, but complexity and instability can make that support difficult to incorporate into household decisions.

In Spain, OCU's guidance on energy-efficiency deductions illustrates a system with different eligibility thresholds, time limits and certification requirements depending on the type and outcome of the works. The deductions also fell out of force and were reinstated several times during 2025–26 before being restored with retroactive effect.

OCU has called for **simpler paperwork, a one-stop shop for renovation aid and payment of subsidies within a maximum of six months**.⁹

Italy provides a related example. Feedback to Altroconsumo's consumer assistance service concerning the Superbonus highlighted frequent regulatory changes and problems associated with the tax-credit transfer mechanism. Altroconsumo has also produced dedicated guidance to help households navigate the different taxes, deductions and housing-renovation incentives.

Belgian evidence shows both the complexity and the value of consolidation. Testaankoop notes that most support for energy renovation is organised regionally and that eligibility conditions can change, but also reports that many forms of financial support have now been brought together through a single portal, making

⁸ <https://www.euroconsumers.org/clear-hp-high-costs-cool-consumer-enthusiasm-for-heat-pumps/>

⁹ <https://www.ocu.org/fincas-y-casas/gestion/fiscalidad/analisis/2026/01/deducciones-irpf-eficiencia-2026>

them easier for consumers to identify.¹⁰

These examples concern principally **national and regional implementation**, rather than demonstrating a burden created directly by EU legislation. They nevertheless illustrate an important practical point for the Commission's simplification exercise: the usefulness of financial support depends not only on its nominal value but also on whether consumers can understand, access and rely on it when planning a substantial investment.

Reuse information rather than recreating it

Testaankoop's work on Energy Performance Certificates provides another concrete simplification example.

Its recommendations focus on making the EPC more useful to the consumer who has to decide what to do with the property next. Among the proposals most relevant to renovation are making information on required heating capacity available so households can avoid unnecessarily oversized systems; better linking recommendations to likely costs and actual consumption; making EPCs easier to update after works; and preserving building information so it can be reused by future owners and professionals.¹¹

The underlying simplification principle is straightforward: **where reliable information about a dwelling has already been collected, consumers should not have to pay repeatedly for equivalent information to be recreated.**

Different housing types require different processes

Finally, simplification needs to reflect the way housing is actually owned.

In apartment buildings, significant renovation may require collective decisions by co-owners because roofs, façades, heating systems and other elements are common parts. Costs are shared between owners and collective installations can also generate economies of scale.¹² CLEAR-HP likewise identified multi-apartment buildings and rented properties as more difficult contexts for heat-pump installation.¹³

¹⁰ <https://www.test-aankoop.be/woning-energie/isolatie/dossier/energiepremies-in-10-vragen>

¹¹ <https://www.test-aankoop.be/woning-energie/isolatie/dossier/energieprestatiecertificaat/punten-ter-verbetering>

¹² <https://www.test-aankoop.be/woning-energie/isolatie/dossier/renovatie-van-appartementen>

¹³ <https://www.euroconsumers.org/clear-hp-high-costs-cool-consumer-enthusiasm-for-heat-pumps>

A renovation process designed around one owner making one individual investment decision will therefore not work equally well across the housing stock.

Public and social housing renovation also raises specific practical and affordability considerations. Simplification should support public authorities and social housing providers in carrying out energy-efficiency upgrades efficiently while safeguarding the long-term affordability of the homes concerned. Simpler arrangements for the temporary relocation and return of tenants during major renovation works could also help facilitate delivery.



4. Practical lessons from the consumer evidence

Euroconsumers' evidence does not cover every determinant of housing supply. Its contribution is strongest on the **consumer dimension of maintaining and improving existing homes**. Within that scope, four practical areas emerge for consideration in the Housing Simplification Package:

- **Keep affordability central.** Consumers are already making renovation decisions under significant financial pressure. Upfront cost, running costs and the cost of necessary works all form part of the affordability of a home.
- **Reduce fragmentation around the consumer.** HORIS and CLEAR-HP demonstrate practical models for bringing advice, technical choices, support and trusted professionals together and reducing the transaction costs before works begin.
- **Make support understandable and predictable.** Evidence from Spain, Italy and Belgium shows that changing rules, multiple eligibility conditions and administrative processes can add uncertainty to already expensive household investments.
- **Reuse information and adapt processes to different housing types.** Testaankoop's EPC and apartment-building evidence shows the value of avoiding duplicate data collection and of designing renovation processes that reflect different ownership and occupancy models.

The consumer case for simplification is therefore not that all regulation is itself a barrier. The evidence points instead to **specific points of friction around renovation that add cost, uncertainty or unnecessary effort**.

For Euroconsumers, this is the part of the housing-supply discussion on which our current evidence is clearest. Simplification can help households maintain and improve the homes that already exist, complementing rather than replacing action aimed at creating additional housing.

In practical terms, that means making it easier for consumers to move from **understanding what their home needs, to identifying appropriate works, establishing what they will cost and save, accessing available support, finding trustworthy professionals and completing the renovation**.

Reducing those barriers can help preserve the quality and affordability of Europe's existing housing stock - an essential part of ensuring that the homes already available remain viable places for consumers to live.



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improve the market.