EDF response to the call for evidence for the Housing simplification package

European Disability Forum

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Introduction

The European Disability Forum is an independent NGO that represents the interests of 100 million Europeans with disabilities. EDF is a unique platform which brings together representative organisation of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

Executive Summary

- Housing is a basic right according to the UN Convention on the Rights of Persons with Disabilities
- Persons with disabilities are disproportionately hit by the housing crisis: almost 70 % of persons with disabilities live in unsuitable accommodation.
- “Simplifying” should not mean lowering standards on sustainability and accessibility.
- Addressing the fragmentation of rules under different levels of governance should be addressed by harmonising EU-wide rules on accessibility and affordability to make our housing future-proof.
- National authorities and the construction sector should be supported to implement existing legislation.
- The Energy Performance of Buildings Directive in particular should rather be implemented properly instead of watered down as it contains many useful provisions on accessibility for persons with disabilities.

EDF Feedback

Housing as a basic right

Even long before the current housing crisis, persons with disabilities have had problems accessing affordable housing that is suited to their individual needs. This opportunity to give feedback is therefore welcome to highlight the issues that persons with disabilities encounter on the housing market.

But before going into details on the initiative at hand, it is important to remember that housing is a basic right and the UN Convention on the Right of Persons with Disabilities (UN CRPD) underlines the need to eliminate obstacles and barriers to accessibility in housing (Article 9), as well as the right to adequate housing and access to social housing programmes for persons with disabilities (Article 28). Furthermore, Article 19 of the CRPD underlines that persons with disabilities must have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and not be obliged to live in a particular living arrangement.

All of this is currently not always given and persons with disabilities are often forced to live in unsuitable, degrading, and sometimes outright dangerous conditions or in segregating residential institutions because no other affordable option is available.

The housing crisis and persons with disabilities

Due to a shortage of accessible housing and the extra costs linked to living in an accessible dwelling, 11% of persons with disabilities in the EU report being overburdened by the cost of their housing[1], a number that would be far higher were it not for the fact that countless persons with disabilities are forced to remain living with their parents well into adulthood due to a lack of suitable housing options, or end up living in institutions, which is the case for an estimated 1.5 millions persons with

[1] https://ec.europa.eu/eurostat/databrowser/view/hlth_dhc060/default/table?lang=en&category=dsb.dsb_ilc.dsb_ilchc

disabilities in the EU[2]. In addition to this, only 28.9% of persons with disabilities consider that their dwelling meets their needs[3]. This means in return that Almost 70% of persons with disabilities live in unsuitable accommodation.

Furthermore, the extra cost of renting and buying accessible housing exacerbates the already-persistent issue of increased poverty and social exclusion among persons with disabilities, whereby 28.8% of persons with disabilities in the EU are currently at risk of poverty and social exclusion, rising to 29.7% for women with disabilities and 35.6% for people with high support needs.

Beyond persons with disabilities' lower average incomes and increased costs for accessible properties, persons with disabilities also face particular barriers in buying properties because of difficulties in accessing financial services to acquire a loan or insurance.

There is also a risk of forcing persons with disabilities to remain in institutions due to a lack of suitable housing that would enable them to live independently in the community.

The cost of simplification

As housing for persons with disability is crucially linked to accessibility of buildings, we have only seen benefits from increasing regulation in this area. "Simplifying", in our experience, often means removing rules that help persons with disabilities to find housing that they can safely and comfortably live in.

Accessible housing is scarce as it is, so we are in principle not in favour of removing obligations on public authorities or the construction sector. Especially because harmonised EU rules usually improve the patchwork-approach of the many different local, regional, and national rules.

[2] https://deinstitutionalisation.com/wp-content/uploads/2020/05/eeg-di-report-2020-1.pdf

[3] https://ec.europa.eu/eurostat/databrowser/view/hlth_dhc020/default/table?lang=en&category=dsb.dsb_ilc.dsb_ilchc

Therefore, we do agree that the rules are fragmented across the different levels of governance and the different Member States which causes difficulties in implementation. For persons with disabilities, it is therefore important that legislation on housing is not removed, but rather further harmonised at EU level to save money and resources.

EU-wide accessibility standards, even if they are currently still voluntary, already exist (see EN 17210) and the wheel does not have to be reinvented 27 times. Rather than reducing or weakening the legal requirements, more should be done to make those harmonised accessibility requirements obligatory throughout the EU to make buildings accessible everywhere to the same, higher level.

Furthermore, simplifying the legislation and removing obligations for example on consultation with Civil Society Organisations, in particular Organisations of Persons with Disabilities, would be counter-productive. It may save some cost and time in the short term, but in the long term this jeopardises the correct transposition and implementation of the legislation.

Instead, national authorities and the construction sector should be supported in implementing those rules, especially with the necessary expertise. Only this will bring an improvement and the certainty for persons with disabilities wherever they live in the EU that they can find affordable housing adapted to their needs which will allow them to be included in the community and participate on an equal basis with others.

The Energy Performance of Buildings Directive

One of the Directives which has only been recently adopted and only entered into force in May 2026, and that is now at risk of being ”simplified”, is the Energy Performance of Buildings Directive (EPBD). One of the huge successes from our point of view was that the Directive also includes obligations to make buildings accessible during renovation, to ensure that they are future-proof for our ageing societies and save costs of retro-fitting later on.

Beyond the environmental benefits of these obligations, it has also been shown that renovating homes can deliver a 75% return on investment through health benefits alone, and improved daylight and indoor air quality in hospitals could cut public healthcare expenditure across the EU by as much as €80 billion a year.[4] The benefits also extends to Europe's energy security, autonomy and resilience: deep insulation of residential buildings could cut the EU's final energy use for heating and cooling by 44%, reducing natural gas consumption for that purpose by 46%. Economically, the European Commission estimated the Renovation Wave would create around 160,000 green jobs by 2030, with every €1 million invested in renovation generating an average of 18 jobs across the EU.[5]

Rather than reopening these rules, the priority now is basic compliance: the European Commission has already initiated infringement procedures against all 27 Member States for failing to fully transpose the revised EPBD within the deadline, which expired on 29 May 2026, underscoring how far implementation still lags behind the law on paper.[6] The EPBD provides significant national flexibility, allowing member states to tailor transposition to their own contexts (e.g. defining their national renovation trajectories, setting their own limit values for life-cycle global warming potential of new buildings…). Weakening or renegotiating the Directive would delay the accessibility, health, security, and economic gains that depend not on new legislation, but on finally putting the existing one into practice.

It is also important to keep in mind that many aspects of the EPBD will only be fully effective and show their benefits in years to come – it should not be about short-term savings but long-term investment and saving costs in the future! For example, making a building accessible for persons with disabilities during a renovation will enable older persons to stay in their building for longer while living independently, reducing cost for future assistance and care.

[4] https://www.bpie.eu/wp-content/uploads/2025/05/BPIEs-Guide-to-EPBD-Implementation-final-version.pdf
[5] Idem
[6] https://build-up.ec.europa.eu/en/news-and-events/news/commission-calls-progress-transposition-energy-performance-buildings-directive

Examples of housing problems for persons with disabilities

Case 1: No access to a shower

“The biggest problem is always the bathroom. When I arrived in Brussels, the only affordable place I could find had a step to enter but the landlord was helpful and built a ramp. But the bathroom was very small and narrow so I could not enter the shower because the hoist did not fit. I lived there for 9 months and in the summer I had to shower and wash my hair on the terrace but it was very uncomfortable because neighbours could see me.

I found a new place which was a bit better. The apartment was big but it was very expensive so I spent about 80 % of my salary on housing. I had limited resources because I was young and had only short-term contracts and an entry level position so I didn’t earn enough. But I had to take it because I was desperate and I could not stay in the hotel, which I had found as a temporary solution.”

Case 2: Trapped in their own building

EDF Executive Committee member Nadia Hadad, who is a wheelchair user, has found herself several times trapped in her own building because of a broken lift. As she described it in a newspaper article, at one point she was confined to her building for 5 days, unable to leave, and ironically missed a conference on inclusion of persons with disabilities due to this. “It is not only the economic damage [of not being able to go to work] but also the humiliation of the situation.”[7]

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[7] https://www.bruzz.be/actua/mobiliteit/rolstoelgebruiker-zit-thuis-vast-door-defecte-lift-gegijzeld-eigen-appartement



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