



Housing, a matter of human rights

**Input to the public consultation
on the European Affordable Housing Plan**

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UN Human Rights Office (OHCHR) and United Nations Human Settlements Programme (UN-Habitat)

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Introduction

The United Nations Human Rights Office (OHCHR) and the United Nations Human Settlements Programme (UN-Habitat) welcome the opportunity to contribute to shaping the European Affordable Housing Plan through the consultation process launched by the European Commission in June 2025.

Access to adequate housing is a human right. The failure of housing policies to recognize this, and thus the responsibility of States to ensure its achievement, has led to the housing crisis we experience in Europe now. The often-clashing interests of housing as habitat and as a commodity has led to its financialization, and has resulted in housing being unaffordable to even middle-income households, while further excluding those on lower incomes. This, compounded with decades of underinvestment of public resources to provide a housing safety-net has left an ever-growing population in challenging circumstances.

While housing is not a direct competence of the European Union (EU), the European Affordable Housing Plan and accompanying instruments such as the Pan European Investment Platform for Affordable and Sustainable Housing and funding instruments under the Multi-Annual Financial Framework provide a unique opportunity to support EU Member States to make housing sustainable and affordable for all.

This paper sets out key considerations and recommendations for an Affordable Housing Plan for Europe grounded in international human rights law. The first section prepared by the UN Human Rights Office elaborates the foundational principles of housing as a human right. The second section provides practical recommendations on how the European Commission can help address the need for sustainable, affordable housing, through the lens of housing as a right and not a commodity. These are drawn from UN-Habitat's engagement with the European Parliament HOUS Committee, the European Commission Housing Task Force, expert group meetings on housing undertaken by UN-Habitat together with DG REGIO, and consultation with housing stakeholders in Europe. It aligns also with guidance emerging through the Global Inter-governmental Expert Working Group on Adequate Housing, annexed. This paper has been reviewed by the UN Environment Programme, who provided inputs on climate and environment elements.

Background

Housing is a right – not a commodity

The right to housing is provided for in article 25 of the Universal Declaration of Human Rights as part of the right to an adequate standard of living, and article 11(1) of the International Covenant on Economic, Social and Cultural Rights (ICESCR). The right to housing of persons with disabilities is protected under the UN Convention on the Rights of Persons with Disabilities (CRPD) through article 28 on the right to adequate standard of living and social protection. The right to adequate housing is also protected under other human rights treaties, as listed in Annex I.

Too often, housing is viewed as a commodity, and not as a human right that is protected under international human rights law. Under international human rights law, to be adequately housed is not merely about having a physical shelter¹. It means having secure tenure²— not having to worry about being evicted³, or having one's lands taken away. It also means living somewhere that is affordable, in keeping with one's culture and with access to appropriate services, schools, and employment. Also, housing is not adequate if specific requirements of disadvantaged and marginalized groups are not considered. Equality and non-discrimination are central tenets of the right to adequate housing, requiring States to prohibit and eliminate discrimination on all grounds and ensure de jure and de facto equality in access to adequate housing and protection against forced eviction⁴.

The right to adequate housing consists of the following elements⁵:

- **Legal security of tenure:** Regardless of the type of tenure, all persons should possess a degree of security of tenure which guarantees legal protection against forced eviction, harassment and other threats
- **Availability of services, materials, facilities and infrastructure:** Housing is not adequate if its occupants do not have safe drinking water, adequate sanitation, energy for cooking, heating and lighting, sanitation and washing facilities, means of food storage, refuse disposal, etc.

¹ See Committee on Economic, Social and Cultural Rights, General Comment No. 4: The Right to Adequate Housing (Art. 11 (1) of the Covenant), (1991) [E/1992/23](#), para. 7

² UN Special Rapporteur on the right to adequate housing, Guiding principles on security of tenure for the urban poor (2014), [A/HRC/25/54](#)

³ See: [Forced evictions | OHCHR](#)

⁴ The International Covenant on Economic, Social and Cultural Rights, in its article 2 (2), identifies the following non-exhaustive grounds of discrimination: race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status; see also Committee on Economic, Social and Cultural Rights, General Comment No. 4: The Right to Adequate Housing (Art. 11 (1) of the Covenant), 1991, [E/1992/23](#), para. 11 and General Comment No. 20, on Non-discrimination in economic, social and cultural rights (2009), [E/C.12/GC/20](#), paras. 8 and 11

⁵ Committee on Economic, Social and Cultural Rights, General Comment No. 4: The Right to Adequate Housing (Art. 11 (1) of the Covenant) (1991), [E/1992/23](#), para. 8

- **Affordability:** Personal or household financial costs associated with housing should not threaten or compromise the attainment and satisfaction of other basic needs (for example, food, education, access to health care)
- **Habitability:** Adequate housing should provide for elements such as adequate space, protection from cold, damp, heat, rain, wind or other threats to health, structural hazards, and disease vectors
- **Accessibility:** Housing is not adequate if the specific needs of disadvantaged and marginalized groups are not taken into account (such as people living in poverty, people facing discrimination; persons with disabilities, victims of natural disasters)
- **Location:** Adequate housing must allow access to employment options, health-care services, schools, child-care centres and other social facilities and should not be built on polluted sites nor in immediate proximity to pollution sources.
- **Cultural adequacy:** The way housing is constructed, the building materials used and the policies supporting these must appropriately enable the expression of cultural identity and diversity of housing.

All EU Member States are party to the ICESCR and the CRPD and receive detailed analysis of human rights gaps and recommendations on how to address them by UN monitoring bodies, including on the right to housing. The EU itself has ratified the CRPD and underwent an expert review in March 2025 with recommendations as to how to achieve independent living and an adequate standard of living and social protection of persons with disabilities.⁶

Country-specific recommendations and findings of international human rights mechanisms which, in addition to the EU's own tools, such as the Social Scoreboard, establish a useful baseline for where States currently stand with respect to the protection and promotion of the right to adequate housing. This information, which can be found online in the UN Human Rights Office's 'Universal Human Rights Index', should be considered when designing and implementing the Affordable Housing Plan.⁷

Principle 19 of the European Pillar of Social Rights on housing and assistance for the homeless⁸ reflects some of the important elements of the right to adequate housing in the Universal Declaration of Human Rights (article 25.1)⁹ and the International Covenant on Economic,

⁶ CRPD/C/EUR/CO/2-3, paras. 48-49 and 66-67

⁷ The findings, recommendations and jurisprudence of international human rights mechanisms are searchable through OHCHR's [Universal Human Rights Index](#)

⁸ "Housing and assistance for the homeless: a. Access to social housing or housing assistance of good quality shall be provided for those in need. b. Vulnerable people have the right to appropriate assistance and protection against forced eviction. c. Adequate shelter and services shall be provided to the homeless in order to promote their social inclusion."

⁹ "Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the

Social and Cultural Rights (article 11.1)¹⁰, but not entirely. The right to adequate housing, as a component of the right to an adequate standard of living, is broader in scope¹¹ and, by extension, so are EU member States' legal obligations in this area. The UN Committee on Economic, Social and Cultural Rights, the UN Committee on the Rights of the Child and the UN Special Rapporteur on the right to adequate housing have also provided additional guidance on the interpretation and scope of this right to adequate housing.¹²

The most relevant international human rights instruments and standards for the Affordable Housing Plan, as well as information about the Open-ended Intergovernmental Expert Working Group on Adequate Housing for All are listed in Annex I.

Who gets to decide what is affordable?

While housing policies are national competence of Member States, rising cost of living as well as a surge in housing prices and homelessness across Europe have sparked an unprecedented momentum for EU-action in this area. For example, between 2015 and 2024, the housing prices increased on average by 53% in the EU, with wide discrepancies among countries: in Hungary prices soared by 210%, whereas in Finland by just over 1%¹³. Rents rose by almost 28% on average and for around one in ten (10,6%) European city dwellers, housing costs exceeded 40% of their disposable income in 2023 – which makes up the so-called 'housing cost overburden rate'.¹⁴ In Greek urban areas, this proportion rose to 31%, and in Denmark to nearly one in four city dwellers (23,3%).¹⁵ Importantly, housing cost overburden rates are significantly higher among those within the lowest income bracket, than those with higher incomes.¹⁶ This points to a growing exclusion of the lower income segments. Moreover, 2024 data suggest that every night, at least 1,3 million people – of whom 400 000 are children - experience homelessness in Europe, and only few countries – for example Finland and Denmark – are making progress in reducing it.¹⁷

event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.”

¹⁰ “The States Parties to the present Covenant recognize the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions. The States Parties will take appropriate steps to ensure the realization of this right, recognizing to this effect the essential importance of international co-operation based on free consent.”

¹¹ See UN Human Rights & UN Habitat, [Fact Sheet No. 21/Rev.1 on the right to adequate housing](#)

¹² UN Committee on Economic, Social and Cultural Rights, General comment No. 4: The right to adequate housing, (art. 11 (1) of the Covenant), (1991), [E/1992/23](#)

¹³ See European Parliament Infographics on [Rising housing costs in the EU: the facts](#), 2024

¹⁴ Share of population living in households that spend 40 % or more of the household disposable income on housing ('net' of housing allowances). Housing costs include rental or mortgage interest payments but also the cost of utilities such as water, electricity, gas or heating.

¹⁵ See Eurostat, [Housing in Europe – 2024 edition](#)

¹⁶ See EU-SILC survey [Housing cost overburden rate by income quintile](#)

¹⁷ See Fondation Abbe Pierre, European Federation of Associations working with the Homeless (2024), [9th Overview of Housing Exclusion in Europe](#) and [E/C.12/FIN/CO/7 \(CESCR 2021\)](#)

These data echo concerns raised by international human rights mechanisms when reviewing EU countries' track record on the right to housing since 2021. The Committee on Economic, Social and Cultural Rights has found rising costs of housing and a lack of adequate, affordable or social housing a recurring concern in the region.¹⁸ It has also highlighted how marginalized communities - including Roma and migrant workers – often live in substandard or overcrowded conditions and at the mercy of exploitative landlords. Concerns have also been expressed at the severe poverty that some households face, especially Roma households, and their difficulty to pay utility bills, as well as at the practice of housing segregation in some parts of the Union.¹⁹

Affordability is an essential element of the right to adequate housing because housing must be financially accessible without undermining the enjoyment of other human rights, such as food, education or access to health care. States must ensure that housing expenses are generally proportionate to income, provide subsidies and appropriate financing for those unable to afford housing, and protect tenants from unreasonable rents or increases. Where natural materials are the main building resources, their availability must also be secured.²⁰

Elaborating on the issue of housing affordability, the United Nations Special Rapporteur on the right to adequate housing has held that “housing and social policies must maintain a non-discriminatory approach, prioritizing the most marginalized groups, and must be tailored to ensure the overarching goal of affordable housing for all”.²¹ Despite increasingly affecting middle-income households too, he highlights that the housing affordability crisis disproportionately hits the urban poor, residents of informal settlements, young people, older persons, members of racial or ethnic minorities, persons with disabilities, women and single-parent households, and thus reinforces de facto discrimination in accessing adequate housing and social exclusion.

It is imperative that policies aimed at housing affordability do not inadvertently exacerbate inequalities and the European Affordable Housing Plan should consider groups in vulnerable situations in all tenures. Measures aimed at increasing housing affordability of disadvantaged groups should be prioritized. High housing expenses of persons with disabilities and costs for accessibility adaptations have, for example, led the Committee on the Rights of Persons with Disabilities to recommend enhancing availability of affordable and accessible housing for persons with disabilities in the European Affordable Housing Plan, and to prioritize funding for this within the Multi-Annual Financial Framework.²²

¹⁸ [E/C.12/HRV/CO/2](#), [E/C.12/CYP/CO/7 \(CESCR 2024\)](#); [E/C.12/ROU/CO/6 \(CESCR 2024\)](#); [E/C.12/IRL/CO/4 \(CESCR 2024\)](#); [E/C.12/FRA/CO/5 \(CESCR 2023\)](#)

¹⁹ [E/C.12/ROU/CO/6 \(CESCR 2024\)](#); [E/C.12/HRV/CO/2](#), [E/C.12/FRA/CO/5 \(CESCR 2023\)](#); [E/C.12/ITA/CO/6 \(CESCR 2022\)](#); [E/C.12/HRV/CO/2 \(CESCR 2025\)](#) [A/HRC/49/48](#); [CRC/C/CZE/CO/5-6 \(CRC 2021\)](#); [A/HRC/43/43/ADD.2 \(SR Housing 2020\)](#)

²⁰ Committee on Economic, Social and Cultural Rights, General Comment No. 4: The Right to Adequate Housing (Art. 11 (1) of the Covenant), (1991), [E/1992/23](#), para. 8(c)

²¹ UN Special Rapporteur on the right to adequate housing, A place to live in dignity for all: make housing affordable, (2023), [A/78/192](#), para. 66

²² [CRPD/C/EU/CO/2-3](#)

Recommendations to the EU by the Committee on the Rights of Persons with Disabilities²³

Living independently and being included in the community (art. 19)

“Adopt unambiguous definitions of community-based services, including personal assistance, to improve targeting of investments, and collect and publish disaggregated data on the services provided and persons with disabilities utilizing them; prioritize investments for the development of accessible and affordable housing for persons with disabilities, personal assistance, centers for independent living, peer support and other types of individualized support respecting the will and preference of persons with disabilities.” (para. 49(g))

Adequate standard of living and social protection (art. 28)

“Prioritize funding for accessible and affordable housing for persons with disabilities by the EU Regional Development Fund in the process of revising EU funding regulations for the 2028-2034 period, and adopt concrete actions to enhance availability of affordable and accessible housing for persons with disabilities in the European Affordable Housing Plan.” (para. 67(c))

Meanwhile, the UN Special Rapporteur on the right to adequate housing has underscored the importance of ensuring housing affordability in the green transition. He has suggested that efforts to reduce carbon emissions in housing are coupled with financial support for low-income and informal households; investing in affordable public and social housing and safeguards such as rent caps, tenant protections, affordable housing quotas in mixed developments, and linking retrofit loans to future energy savings to prevent green requirements from driving up housing costs.²⁴ The EU’s green ambitions to improve energy efficiency of buildings, notably through the Energy Performance of Buildings Directive and its transposition into domestic law, will require careful consideration to ensure that they are socially inclusive and that human rights are protected. Such considerations should also be taken into account in the European Affordable Housing Plan.

To ensure that the European Affordable Housing Plan contributes to the right to housing for everyone, the European Commission should monitor housing affordability and collect disaggregated data to capture the situation and barriers of specific groups.

²³ Ibid.

²⁴ UN Special Rapporteur on the right to adequate housing, Towards a just transformation: climate crisis and the right to housing, (2022), [A/HRC/52/28](#), para. 74

The human rights indicators developed by the UN Human Rights Office can serve as a useful framework in this regard.²⁵ Illustrative indicators on the right to housing have been included in Annex II.²⁶

The report “A place to live in dignity for all: make housing affordable”, by the UN Special Rapporteur on the right to adequate housing which also reflects on the importance of measuring housing affordability and using disaggregated indicators, could meaningfully inform the preparation of the European Affordable Housing Plan as well as its implementation²⁷

²⁵ UN Human Rights (OHCHR), “[Human rights indicators. A guide to measurement and implementation](#)”, 2012, and the tables of illustrated indicators, updated to include SDG indicators:

²⁶ Ibid.

²⁷ Special Rapporteur on the right to adequate housing, A place to live in dignity for all: make housing affordable, (2023), [A/78/192](#)

Recommendations

The European Affordable Housing Plan represents an opportunity to promote measures that put people at the centre and make housing affordable to everyone. It is an opportunity to recommit to the universal standards contained in international human rights law and strengthen equality and inclusion in the EU. The European Commission is encouraged to consider the following recommendations in designing, implementing and monitoring the Plan:

General recommendations

- Ensure that all EU policy and funding efforts to promote affordable housing and to combat homelessness take a human rights-based approach. In this context, **explicitly recognize housing as a human right**; promote strategies that prevent segregation, forced evictions and homelessness and invest in affordable housing, community-based services and housing-led initiatives
- Recognize **housing as an entry point to achieving other human rights** and dignity, noting that supporting the housing rights of Roma communities, persons with disabilities and other marginalized groups in Europe, is key to their economic and social inclusion and to enabling access to key services including health, employment and education. The European Affordable Housing Strategy should encourage the use of Cohesion Policy funding to undertake targeted support programmes to desegregate Roma – and other communities, and improve their housing conditions.
- Ensure that **green transition and energy efficiency efforts are just and fair** and align with international human rights standards, such as the Covenant on Economic, Social and Cultural Rights. Couple such efforts with targeted measures for low-income groups to ensure that they are inclusive and socially sustainable.
- Use **human rights indicators** developed by the UN Human Rights to monitor the implementation of interventions in the area of housing. Note, in particular, the illustrative table of indicators on the right to adequate housing, annexed to this paper.
- Ensure **coherence with current and future EU policies** relevant to equality and social rights, in particular the Child Guarantee, the EU Anti-Racism Strategy, the EU Roma Strategic Framework for Inclusion, Equality and Participation, the EU Anti-Poverty Strategy, the Disability Strategy and the 2028-2034 Multi-Annual Financial Framework.
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- Foresee a **mechanism for the meaningful participation** of beneficiaries and communities affected, especially those most left behind, in the design and implementation of the Affordable Housing Plan.

Technical recommendations

1. Affordable Housing Principles and Mechanisms

- **Affordable Housing Principles.** The definition of affordable housing must be clearly established to prevent public funds intended for the poorest households—such as for social housing—from being diverted to alternative schemes that, while reducing costs, remain out of reach for those most in need.
- **Subsidies.** Public resources should act as a catalyst to leverage private capital rather than serve as a source of housing finance. Subsidies must be carefully designed to address structural barriers that prevent low-income households from accessing adequate housing. Instead of supporting individual buyers in overheated markets, funds should prioritize long-term solutions that remain permanently affordable and recycle resources back into public housing funds, emphasizing collective over individual support. The right mix of supply and demand subsidies will depend on local conditions and priorities.
- **Long-term Affordability.** Affordable housing initiatives receiving direct public funding should remain affordable in perpetuity, be shielded from profit extraction, and ensure that public funding contributions stay within the housing system.
- **Social Housing.** A clear and coordinated institutional framework is essential for effective social housing. Successful programmes require well-defined roles across national, regional, and local levels, supported by dedicated agencies, political commitment, and tenant participation to ensure accountability and continuity. Flexible regulatory frameworks enable context-specific, inclusive models. Lasting impact depends not only on building units but on a holistic approach that combines social support, inclusive governance, and fair access. Integrated service provision and transparent allocation criteria help make social housing a driver of social inclusion, human development, and territorial justice.
- **Minimum share of affordable housing.** Mechanisms, existing in several Member States, where government can demand a share of affordable housing within developer-led housing and urban development schemes should be encouraged. As well as financing affordable housing off balance sheet, they reduce the risk of creating social ghettos by mixing a variety of housing unit types. By applying above principles of affordable housing, these mechanisms can contribute to building a permanently affordable housing stock. Within such framework, local authorities should be eligible for EU funding to expand the provision of serviced brownfield land for housing. This helps leverage land value to support the provision of affordable housing, and incentivizes private sector delivery.

- **Cooperative and community-based forms of housing** contribute to an affordable housing sector as they tend to include mechanisms that prohibit or limit the profit that can be extracted from real estate operations. Several models of cooperative housing exist, depending on local context and culture. Cooperative and other non-conventional forms of housing such as community land trusts are also associated with social benefits as they often include structural mechanisms to support social cohesion and solidarity within the housing community. Supporting these models helps curb financialization and speculation. In some Member States, community-led housing projects struggle to access commercial financing; therefore, public guarantees could unlock the potential of this model to expand to Member States where these forms of housing organization are not yet well established. Governments may want to establish dedicated legal frameworks, provide low-interest or guaranteed loans to cooperative entities and allocate public land to support their development.

The European Commission Affordable Housing Plan can support these recommendations by:

- 1.1 Introducing mechanisms to prioritize funding proposals in locations with greatest housing stress – this would require Member States to provide housing stress data.*
- 1.2 Defining principles of Affordable Housing that underscore principles of perpetual affordability, prevent profit extraction and retain public funding in the system.*
- 1.3 Providing mechanisms to ensure direct funding for Affordable Housing aligns with these principles, by introducing an Affordable Housing Compass to assess proposals*
- 1.4 Providing mechanisms through instruments such as the Cohesion Policy and EIB loans for Local Authorities to increase the supply of serviced brownfield land for housing and urban development that incorporates a defined share of Affordable Housing*
- 1.5 Introducing mechanisms to promote sharing knowledge on affordable housing solutions and support networks.*

2. Public Bodies, Urban Planning and Land Policies

- **Role of Public Bodies.** Public authorities must have a strong mandate to steer the housing market toward inclusive and affordable outcomes. This requires deploying financial, regulatory, and institutional tools in combinations tailored to local contexts, capacity, and needs. Integrated housing strategies linking planning, finance, land, and regulation can improve affordability, stimulate local economies, and foster inclusive urbanization.
- **Planning and Permitting.** Regulatory simplification and faster permitting are important but must not weaken social, health, or environmental standards. The goal is not just *faster* but *better* planning—more flexible and responsive to local needs. Digitalizing permitting processes can help reduce delays and administrative burdens.
- **Densification.** Increasing housing supply in well-serviced areas can be achieved through infill development, vertical expansion, zoning reform, and the conversion of existing buildings. Effective densification must account for the needs of current residents, safeguard social cohesion, ensure quality design, and provide green and public spaces.

- **Repurposing Vacant Buildings.** Reusing vacant buildings helps limit land take, preserve heritage, reduce emissions, and support densification and inclusion. More flexible renovation and planning standards, along with incentives for owners to release properties, can expand supply. As many vacant buildings are in declining industrial or commercial areas, local authorities should be empowered to integrate their reuse into urban revitalization strategies. Supporting municipal acquisition of underused or vacant buildings can trigger urban transformation, creating affordable housing and spaces for creative industries, incubators, students, and youth—catalysts for urban renewal and private investment.
- **Land Provision.** Making land available for residential use may be appropriate where densification is not feasible. However, this must not undermine the goal of no net land take or encourage sprawl. Urban extensions should follow sound planning principles that promote compact development, strong transport links, active mobility, quality public spaces, and access to services, decent jobs and community infrastructure.

The European Affordable Housing Strategy can support these recommendations by:

2.1 Ensuring that criteria guiding finance support for housing, including through the Pan-European Investment Platform and EIB loans, promotes appropriately located, integrated housing strategies. This could be incorporated in the Affordable Housing Compass recommended earlier.

2.2 Providing mechanisms to enable Local Authorities to increase the supply of serviced brownfield land for housing and urban development that incorporates a defined share of Affordable Housing (as noted above)

2.3 Ensuring that Local Authorities are eligible for loans to purchase vacant buildings through EC supported instruments, including EIB loans

2.4 Supporting knowledge exchange on the simplification and speeding up of planning and building consent processes.

3. Housing finance

- **Diversify housing finance instruments.** Governments should support a wider ecosystem of financial intermediaries, enhancing their capacity to mobilize long-term capital and effectively manage risks. This includes supporting cooperative and mutual housing finance models, instruments to support the rental sector, and blended finance strategies.
- **Housing Financialization.** Institutional landlords, especially REITs and pension funds, have increased their impact in Europe and are linked to increasing housing costs. Member States should reclaim the governance of housing systems from global financial markets, actively regulating real estate markets to ensure transparency, limit speculation, and realign investment in the housing sector with socio-environmental goals. Policy makers should also consider the impacts of monetary and financial policies on the financialization of the housing market.
- **Short-term rentals.** The short-term rental market is reducing the availability and increasing costs of housing. It is recommended to provide a framework, common rules and guidance to support local governments in addressing the question of short-term rentals. Such a framework should establish legal certainty for local governments, impose limits on the number of rental days, require licensing and transparency, and prioritize long-term residential use of housing stock, particularly in cities facing acute housing shortages. Applying additional taxes for secondary and empty homes can increase housing supply. The distribution of such tax revenues should be discussed and the disparity between municipalities addressed.

The European Commission Affordable Housing Strategy should:

3.1 Offer a mechanism to support Member States to establish transparency register concerning institutional landlords and corresponding transactions

3.2 Consider the impacts of monetary and financial policies on the financialization of the housing market

3.3 Offer guidance on short-term rental that upholds the principle that commercial interests in housing should not compromise the social value of housing.

4. Rental markets

- Renters are most affected by housing unaffordability. It is recommended that rental laws define minimum rights and obligations for both tenants and landlords concerning the duration of leases, quality standards and energy performance, the conditions for terminating the lease contract, as well as the cost of renting and its evolution over time, and protection from eviction, therefore balancing the right to private property with the social function of housing. Housing taxation should be tenure-neutral, meaning that many EU Member States should consider moving away from the current regime of favouring home ownership over rentals, which has increased prices through supply-side subsidies.

The European Commission Affordable Housing Plan could support this recommendation by:

4.1 Establishing a menu of housing rental interventions for Member States and cities based on a catalogue of situations and needs.

5. Data collection and monitoring of the right to adequate housing

- **Baseline indicators.** Consider the recommendations and findings of international human rights mechanisms which, in addition to the EU's own tools, such as the Social Scoreboard, establish a useful baseline on where Member States currently stand with respect to the protection and promotion of the right to adequate housing when designing and implementing the Affordable Housing Plan.
- **Monitoring.** Consider establishing a European housing observatory to establish indicators on housing stress and overburden, and, in a centralized manner, collect openly available data on house prices, housing transactions including by financial actors, and short-term rentals. Consider including data about public subsidies for housing as well as tax breaks for owners.

The European Commission Affordable Housing Plan could support this recommendation by:

5.1 Proposing the establishment of a European Housing Observatory in line with the considerations above and in consultation with relevant stakeholders, including the United Nations, networks of housing providers, community-led housing, and tenants.

6. Green Transition and Climate Resilience

- **Just and Inclusive Green Transition.** Green transition and energy efficiency efforts should be fair, aligned with human rights standards (e.g., ICESCR), and paired with targeted support for low-income groups to promote social sustainability.
- **Environmental Impact.** The environmental footprint of housing and construction should be addressed upstream, prioritizing reuse and retrofitting over repurposing and new construction, and minimizing fossil fuel and chemical use across the building life cycle. Nature-friendly building norms can enable insects and birds to find habitat in walls and on roofs, therefore contributing to halting biodiversity loss.
- **Pragmatic Energy Efficiency.** The EC focus on insulation is a sound approach when applied pragmatically. For example, insulating roofs before walls can better preserve historic buildings. Incorporating rainwater harvesting and passive cooling should be standard practice. So-called renovictions are of concern and it should be ensured that owners can pass on insulation costs to renters only to a limited extent, ideally up to the amount that renters save in reduced heating or cooling costs.
- **Low-Tech, Low-GHG Solutions:** New construction should favour passive solar heating and lighting, natural ventilation, reduced plastic and chemical use, and lime mortar over cement to lower emissions. Enhancing comfort through passive design (radiation heating, humidity regulation) should be prioritized.
- **Materials and Circularity:** Encourage locally sourced, low-tech, fossil-free materials and create standards to develop a second-hand market. Strengthen certification norms for recycled materials to ensure quality and support a circular construction economy.
- **Climate Risks.** As climate risks such as heatwaves, floods, wildfires, and coastal erosion intensify, housing must both cut emissions and withstand climate impacts. No new housing should be built in high-risk areas without strong protective measures that safeguard health, structural integrity, and long-term habitability. Risk-informed planning, climate-adaptive design, and robust enforcement should be embedded in national and local policies to prevent future vulnerabilities and uphold the right to safe, adequate housing.

The European Affordable Housing Plan can support these recommendations by:

6.1 suggesting minimum shares of reused material in new construction

6.2 encouraging Member States to pass nature-friendly building norms and that prioritize low-tech, sustainable and local building materials and encourage certification of these

6.3 encouraging Member States to use JRC and other data about climate risk areas and consider these risks in new building permits.

Conclusion

The United Nations stands ready to support the European Union and its Member States in promoting and protecting the human right to adequate housing. This requires national and local governments, private sector and civil society to work together within the framework of housing being a right, and not a commodity. Through the Affordable Housing Plan, the European Commission is uniquely placed to bring these stakeholders together, leveraging their full potential, primarily through well directed funding mechanisms and by resolving legislative bottlenecks.

UN Agencies in Brussels, including UN-Habitat, UN Human Rights Office and UN Environment Programme have been pleased to support the work of the European Commission Housing Task Force to convene and provide analysis and to support practical recommendations. Moving forward, the UN in Brussels stands ready to support the European Commission in its endeavour to improve the affordability and sustainability of housing in the Member States. In particular, the UN is keen to work with housing sector partners and stakeholders and the Commission to prepare an Affordable Housing Compass, that provides a clear and fair basis for assessing housing proposals submitted to the European Commission and its relevant instruments, to ensure maximum impact of EU funding leading to the achievement of sustainable, adequate and affordable housing for all in Europe. Furthermore, the UN will be pleased to collaborate with the European Commission to support the implementation of the European Affordable Housing Plan through availing tools including the planned UN-Habitat Global Housing Hub in Paris and the UNEP Global Alliance for Building and Construction.

ANNEX I: Relevant United Nations Sources on adequate housing

I. INTERNATIONAL HUMAN RIGHTS TREATIES & STANDARDS

Universal Declaration of Human Rights

- Article 2 – Non-discrimination
- Article 22 – Social security
- Article 25(1) – Adequate standard of living including food, clothing, housing and medical care and necessary social services, and social protection

International Covenant on Economic, Social and Cultural Rights

- Article 2(2) - Non-discrimination
- Article 3 - Equality of rights between men and women
- Article 11(1) - Adequate standard of living, including adequate food, clothing and housing

International Covenant on Civil and Political Rights

- Article 2(1) - Non-discrimination
- Article 3 - Equality of rights between men and women
- Article 17 – Protection against arbitrary or unlawful interference with privacy, family, home or correspondence
- Article 26 – Equality before the law

International Convention on Elimination of All Forms of Racial Discrimination

- Article 5 (e)(iii) – Prohibition of discrimination and equality before the law, in the enjoyment of economic, social and cultural rights, particularly the right to housing

Convention on the Elimination of All Forms of Discrimination against Women

- Article 2 – Prohibition of discrimination and equality before the law
- Article 14(2) – Eliminating Discrimination against women in rural areas
- Article 15(2) – Equal legal capacity and property rights of women

Convention on the Rights of the Child

- Article 2 – Non-discrimination
- Article 16(1) – Protection against arbitrary or unlawful interference with the child’s home
- Article 27(3) – Adequate standard of living, including nutrition, clothing and housing

Convention on the Rights of Persons with Disabilities

- Article 5 – Equality and non-discrimination
- Article 9 – Accessibility
- Article 19 – Living independently and being included in the community
- Article 28 – Adequate standard of living and social protection

International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families

- Article 43(1)(d) – Equality of treatment in access to housing for migrant workers

II. INTERPRETATIVE GUIDANCE ON INTERNATIONAL HUMAN RIGHTS STANDARDS

UN Committee on Economic, Social and Cultural Rights

- General Comment No. 20 (2009) on non-discrimination in economic, social and cultural rights, [E/C.12/GC/20](#)
- General Comment No. 16 (2005) on the equal right of men and women to the enjoyment of all economic, social and cultural rights, [E/C.12/2005/4](#)
- General Comment No. 7 (1997) on the right to adequate housing: forced evictions, [E/1998/22](#)
- General Comment No. 5 (1994) on persons with disabilities, [E/1995/22](#)
- General Comment No. 4 (1991) on the right to adequate housing (art. 11 (1) of the Covenant), [E/1992/23](#)

UN Committee on the Elimination of All Forms of Racial Discrimination

- General Recommendation No. 37 (2024) on equality and freedom from racial discrimination in the enjoyment of the right to health, [CERD/C/GC/37](#)
- General Recommendation No. 34 (2011) on racial discrimination against people of African descent, [CERD/C/GC/34](#)
- General Recommendation No. 27 (2000) on discrimination against Roma [CERD/C/GC/27](#)

UN Committee on the Rights of the child

- General comment No. 26 (2023) on children's rights and the environment, with a special focus on climate change, [CRC/C/GC/26](#)
- General comment No. 21 (2017) on children in street situations, [CRC/C/GC/21](#)

UN Committee on the Elimination of Discrimination against Women

- General recommendation No. 34 (2016) – on the rights of rural women, [CEDAW/C/GC/34](#)
- General recommendation No. 21 (1994) on equality in marriage and family relations, [A/49/38](#)

UN Committee on the Rights of the people with disabilities

- General comment No. 6 (2018) on equality and non-discrimination, [CRPD/C/GC/6](#)
- General comment No. 5 (2017) on living independently and being included in the community, [CRPD/C/GC/5](#)
- General comment No. 3 (2016) on women and girls with disabilities, [CRPD/C/GC/3](#)
- General comment No. 2 (2014) on accessibility, [CRPD/C/GC/2](#)

III. REPORTS BY SPECIAL PROCEDURES OF THE UN HUMAN RIGHTS COUNCIL

Special Rapporteur on the right to adequate housing as a component of the right to an adequate standard of living

- Towards a just approach to the global housing crisis and migrants (2025), [A/HRC/58/50](#)
- Towards guiding principles on resettlement: a review and assessment of current laws, policies and practices (2024), [A/79/317](#)
- Breaking the cycle: Ending the criminalization of homelessness and poverty (2024), [A/HRC/56/61/Add.3](#)
- Report of Mission to the Netherlands (2024), [A/HRC/55/53/Add.1](#)
- A place to live in dignity for all: make housing affordable (2023), [A/78/192](#)
- Towards a just transformation: climate crisis and the right to housing (2023), [A/HRC/52/28](#)
- Spatial Segregation and the right to adequate housing (2022), [A/HRC/49/48](#)
- Discrimination in the context of housing (2021), [A/76/408](#)
- Report of Mission to France (2020), [A/HRC/43/43/Add.2](#)

- Guidelines for the Implementation of the Right to Housing (2020), [A/HRC/43/43](#)
- Access to justice for the right to housing (2019), [A/HRC/40/61](#)
- Human rights-based national housing strategies (2018), [A/HRC/37/53](#)
- The right to housing for residents of informal settlements (2018), [A/73/310/Rev.1](#)
- Financialization of housing and the right to adequate housing (2017), [A/HRC/34/51](#)

Special Rapporteur on extreme poverty and human rights

- The working poor: a human rights approach to wages (2023), [A/78/175](#)
- Banning discrimination on grounds of socioeconomic disadvantage: an essential tool in the fight against poverty (2022), [A/77/157](#)
- The persistence of poverty: how real equality can break the vicious cycles (2022) , [A/76/177](#)
- Report of Mission to the European Union, (25 November 2020 to 29 January 2021) [A/HRC/47/36/Add.1](#)
- The “just transition” in the economic recovery: Eradicating poverty within planetary boundaries (2020), [A/75/181/REV.1](#)
- Report of Mission to Spain, (27 January to 7 February 2020), [A/HRC/44/40/Add.2](#)

Other Special Procedures mandates relevant to the right to adequate housing:

- Special Rapporteur on the rights of persons with disabilities
- Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health
- Special Rapporteur on the issue of human rights obligations relating to the enjoyment of a safe, clean, healthy and sustainable environment
- Independent Expert on the effects of foreign debt and other related international financial obligations of States on the full enjoyment of all human rights, particularly economic, social and cultural rights

IV. OTHER UNITED NATIONS PUBLICATIONS

- Inclusive policies and programmes to address homelessness. Report of the Secretary-General. United Nations General Assembly (2025), A/80/316.
- Proposed Recommendations on Social Housing. United Nations Human Settlements Programme. Open-ended Intergovernmental Expert Working Group on Adequate Housing for All (2025), [HSP/OEWG-H.2025/INF/5](#)

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- Proposed Recommendations on Housing Finance. United Nations Human Settlements Programme. Open-ended Intergovernmental Expert Working Group on Adequate Housing for All (2025), [HSP/OEWG-H.2025/INF/2](#)
- Proposed Recommendations on Tenure Security for Housing. United Nations Human Settlements Programme. Open-ended Intergovernmental Expert Working Group on Adequate Housing for All (2025), [HSP/OEWG-H.2025/INF/3](#)
- UNECE/UN-Habitat/Housing Europe: Housing 2030 - Effective policies for affordable housing in the UNECE region (2021)
- OHCHR and UN-Habitat: Factsheet No. 21 (Rev. 1) on The Right to Adequate Housing (2009)

V. Information about the Open-ended Intergovernmental Expert Working Group on Adequate Housing for All

The Working Group referenced in the title was established by the United Nations in 2023. This group meets several times per year in different formats, including intersessional online meetings. It offers Member States an opportunity to provide inputs and suggest recommendations on thematic issues that have been proposed by the co-chairs (currently France and Kenya) and prepared by UN-Habitat.

A comprehensive set of housing policy recommendations will be derived from the Expert Working Group sessions and presented to all UN Member States for final consideration and possible adoption at the third session of the Habitat Assembly in 2029.

To date the Expert Working Group has endorsed the following proposed recommendations as referenced in the Annex IV:

- Proposed recommendations on Housing Finance
- Proposed recommendations on Tenure Security for Housing
- Proposed recommendations on Informal Settlements
- Proposed recommendations on Social Housing

And discussed the following reports:

- Concept note and annex on Definition of Homelessness
- Concept note and annex on Informal Settlements
- Concept note and annex on Housing Sustainability
- Concept note and annex on Housing Monitoring Framework
- Executive Director report – Progress toward the establishment of a Housing Knowledge Platform



ANNEX II: Illustrative Indicators on the right to adequate housing

Table 7 Illustrative indicators on the right to adequate housing (universal declaration of human rights, art. 25)

	Habitability	Accessibility to associated services	Housing affordability	Security of tenure
Structural	• International human rights treaties relevant to the right to adequate housing ratified by the State • Date of entry into force and coverage of the right to adequate housing in the constitution or other forms of superior law • Date of entry into force and coverage of domestic laws for implementing the right to adequate housing • Existence of independent national human rights institutions in compliance with the Paris Principles [16.a.1] • Number of registered and/or active NGOs (per 100,000 persons) involved in the promotion and protection of the right to adequate housing • Time frame and coverage of national housing policy or strategy for the progressive implementation of measures, including special measures for target groups, for the right to adequate housing at different levels of government • Time frame and coverage of national and local policy on rehabilitation, resettlement and national disaster risk reduction strategies in line with the Sendai Framework for Disaster Risk Reduction 2015–2030 [1.5.3/11.b.1/11.b.2]			• Date of entry into force and coverage of legislation on security of tenure, equal inheritance and protection against forced eviction
Process	• Proportion of received complaints on the right to adequate housing investigated and adjudicated by the national human rights institution, human rights ombudsperson or other mechanisms and the proportion of these responded effectively to by the Government • Number of and total public expenditures on housing reconstruction and rehabilitation by evicted/displaced persons during the reporting period • Net official development assistance for housing (including land and basic services) received or provided as proportion of public expenditure on housing or gross national income [16.6.1/17.3.1] • Proportion of targeted residents reporting satisfaction with how involved they feel in decision-making affecting their enjoyment of the right to adequate housing • Proportion of cities with a direct participation structure of civil society in urban planning and management that operate regularly and democratically [11.3.2] • Proportion of homes (cities, towns and villages) brought under the provisions of building codes and by-laws in the reporting period • Share of public expenditure on social or community housing • Habitable area (sq. m.) added through reclamation, including of hazardous sites and change in land-use pattern, in the reporting period • Habitable area (sq. m. per capita) earmarked for social or community housing during the reporting period • Ratio of land consumption rate to population growth rate [11.3.1] • Average share of the built-up area of cities that is open space for public use for all, by sex, age and persons with disabilities [11.7.1] • Proportion of population living in cities that implement urban and regional development plans integrating population projections and resource needs, by size of city [11.a.1]	• Share of public expenditure on provision and maintenance of sanitation, water supply, electricity and other services of homes • Proportion of targeted population that was extended sustainable access to safely managed drinking water, sanitation services, electricity and waste disposal in the reporting period	• Proportion of households that receive public housing assistance, including those living in subsidized rental and subsidized owner-occupied housing • Proportion of targeted households living in squatter settlements rehabilitated in the reporting period • Proportion of homeless population that used public or community-based shelters in the reporting period	• Average time taken to settle disputes related to housing and land rights in courts and tribunals • Number/proportion of legal appeals aimed at preventing planned evictions or demolitions ordered by courts in the reporting period • Number/proportion of legal procedures seeking compensation following evictions in the reporting period, by result after adjudication • Number and proportion of displaced or evicted persons rehabilitated or resettled in the reporting period
Outcome	• Proportion of population with sufficient living space (persons per room or rooms per household) or average number of persons per room among target households • Proportion of households living in permanent structure in compliance with building codes and by-laws • Proportion of households living in or near hazardous conditions • Hazardous waste generated per capita and proportion of hazardous waste treated, by type of treatment [12.4.2]	• Proportion of urban population living in slums, informal settlements or inadequate housing [11.1.1] • Proportion of population using safely managed drinking water [6.1.1], sanitation services [6.2.1], electricity [7.1.1] and waste disposal [11.6.1] • Proportion of population living in households with access to basic services [14.1] • Proportion of population that has convenient access to public transport, by sex, age and persons with disabilities [11.2.1] • Proportion of the rural population who live within 2 km of an all-season road [9.1.1] • Proportion of household budget of target population groups spent on water supply, sanitation, electricity and waste disposal	• Proportion of households spending more than "X" per cent of their monthly income or expenditure on housing or average rent of bottom three income deciles as a proportion of the top three • Annual average of homeless persons per 100,000 population "X" being defined normatively for the national context)	• Reported cases of "forced evictions" (e.g., as reported to the special procedures), in the reporting period • Proportion of total adult population with secure tenure rights to land, with legally recognized documentation and who perceive their rights to land as secure, by sex and by type of tenure [14.2]

All indicators should be disaggregated by prohibited grounds of discrimination [17.18.1], as applicable and reflected in metadata sheets

[] Sustainable Development Goals-related or corresponding indicators.