EU PEERS
Community for Integrated Home Renovation Services

Response to the hearing and public information of the RD regulating the

National Housing Plan 2026-2030

Co-funded by the European Union

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The EU Peers Community works to strengthen and consolidate the renovation sector in Spain. In this regard, in February 2025 we published the report Four key issues for the future of the renovation sector, which offered recommendations for public policies:

1. Incentives beyond subsidies
   - Focus on tax incentives
   - Monetize co-benefits
   - Aid for vulnerable households and with simple processes
2. Citizens who demand renewal
   - Incorporate a communication plan within the PNRE
   - There are different profiles, with different interests
   - Landlords must assume their role in the transition
3. Trained and capable workers
   - Promoting the training of workers
   - Regulated immigration plans
   - Advancing in the digitalisation and industrialisation of the sector
4. Robust and professional renovation sector
   - Regulate the figures of the Rehabilitation Agent and the Single Windows
   - Clear business models
   - Public-private partnership

The hearing and public information process of the Royal Decree regulating the State Housing Plan 2026-2030 has recently been opened, an essential document for the future of renovation in Spain as it develops a series of lines of aid that are key to giving continuity to renovations and avoiding the collapse of the sector after the end of Next-Generation aid.
This document includes specific ideas and recommendations to improve this aid and ensure that Spain achieves its objectives in terms of decarbonisation and building renovation.

1. Recovering the waiting list for Next-Generation funds

Justification

The temporary end (June 2026) or of amounts (funds exhausted in some Autonomous Communities) has meant that many communities of owners have carried out the procedures for the Next-Generation subsidies, and have even been responded favourably, but that in practice it is impossible for them to meet the deadlines and receive the subsidy. This situation is generating discredit and frustration on the part of citizens, which will affect citizens' vision of renewal and public institutions.

Members, such as EOS RenovAcción, identify the following situations:

- Communities of neighbours and individual owners who have contracted building renovation works, but in whose autonomous community no call has been published in the year in which they decided to take the step. Example: Castilla y León, contracts formalized but from 2024 without a call.
- Applications for aid that will be left out due to lack of funds. Example: applications submitted to the Community of Madrid in September 2023 that, to date, have not even received a request, a resolution is no longer expected and if it arrives there is no time to finish works in June 2026.
- Favourable resolutions granted but already out of date for execution before June 2026, which places the beneficiary communities in an economic-financial limbo, especially if they try to undertake the intervention and are left halfway. Examples: grants granted in April 2025 or applications for 2023 resolved after more than two years of waiting, with the need to review prices and contracts due to cost increases, which imply new approvals that will delay the process.

On the other hand, the criteria of line 2 of the draft Plan are substantially similar to those used in the Next-Generation funds, so it does not seem incompatible to generate mechanisms for the transition from one aid programme to another.

Proposal

It is proposed to establish a transitional article or provision that allows applicants for the Next-Generation Funds who have already submitted the application to process themselves directly with the above criteria and to access the Plan's funds as a priority.

The previous point can be instrumentalised by means of a 'waiting list' of applicants, which includes the documents already submitted and agreements already reached to facilitate the processing of future aid.

This is intended to 'rescue' these citizens in their renovation process, which is now uncertain, to quickly channel the funds of the Plan and to reduce bureaucracy by avoiding the justification of each building twice.

2. Promoting alternative funding models to grants

Justification

Direct subsidies are an effective instrument for increasing demand, but they are administratively expensive and less leveraged than other financing instruments. Since the building renovation policy will need to be maintained until at least 2050, public investment should focus on as much leverage of private investment as possible.

The Next-Generation funds have been a great learning experience in financing the renovation. On the one hand, the subsidies in its charge have activated an incipient and specialized demand for the renovation sector. On the other hand, indirect investments such as tax deductions or the ICO guarantee fund have allowed the development of competitive private products that multiply private investment by a lot. Both ICO funds and allowances are in force until December 2025, with great uncertainty about their continuation that must be tackled.

Along with the experience of the Next-Generation in Spain, there are foreign examples (Germany, Ireland...) that show that the most effective policies are those that combine subsidies with partially subsidized private loans. In addition, reports such as the Model for a financial instrument with a grant component to support energy efficiency (EC & EIB, 2022) and the report of the PNRE Expert Bureau on Business Model and Financing Instruments (pending publication) identify the potential of private instruments to finance renewal.

Proposal

Allocate part of the Plan's financing to indirect instruments to support renewal, such as tax deductions, specific auctions of CAEs, ICO guarantee lines for loans to homeowners' associations or other alternative models. This could translate into a new program within line 2 of direct management by the State through the ICO.

In order to give a signal to the market and for the sector to transition from a subsidised model to a private financing model, it is suggested that the funds allocated to the support of financing instruments increase over the years of the Plan, while the renewal amounts are slightly reduced.

Another option may be the deployment of loans through public entities, either administrations (examples: French Third-Party Financing, IDAE loans or AMB urban planning quotas) or through public banks (example: French Banque des Rénovations, Irish SBCI or German kWf). These models require greater deployment and initial effort. Successful examples in this line are the PAREER and PAREER CRECE plans, which provided public-private financing at 0% interest.

3. Securing part of the budget for rehabilitation

Justification

Of the total budget, the Plan proposes a distribution by lines of 40%-30%-30%, ensuring that at least 40% is allocated to the first line. This gives the Autonomous Communities freedom to promote one line or another. This design allows flexibility and adaptation of the Plan to the context of each Autonomous

Community. However, there is a risk that some Autonomous Communities will choose to focus resources on one of the lines, leaving the rest without a budget.

On the other hand, the Plan lacks flexibility in the territorial distribution of funds. In the event that a Autonomous Community does not justify its commitments in a timely manner, the budget may be allocated to other state actions in the field of housing (Art. 105), but in no case may it be used to increase the allocation to other Autonomous Communities (Art. 7).

To achieve the renovation objectives, it will be necessary to mobilize from an item of 6,000 million euros per year, dedicated to the energy renovation of the built stock, the amounts of 7,000 to 5 years for "everything" we consider pyrrhic and far out of the reality of the objectives of the PNIEC. As justification for these amounts, the direct and indirect costs of inaction must be taken into account: extreme climatic events; pollution; health; low competitiveness; external and geostrategic energy dependence.... "The decarbonisation of the building sector should be a national and European strategic priority, energy sovereignty should be understood as a national emergency", without assessing the current current current of external pressures to increase spending on security and defence in Spain and Europe, part of the funds that are being talked about to mobilise should be allocated as a climate emergency for other non-arms purposes but that do directly affect Spanish and European national security, such as extreme climatic events and the search for energy sovereignty mentioned above.

Proposal

It is proposed to prioritize building renovation policies given the great co-benefits it generates for society. To this end, it is necessary to increase the allocation of this item in the long term.

With regard to the operation of the Plan, it is proposed to establish minimum amounts to be allocated for each line. Specifically, for line 2 of 'Rehabilitation, accessibility and renovation' at least between 20% and 25% of the Plan's budget should be allocated.

In addition, it is proposed to include in Article 105 the possibility of allocating the fund not consumed by some Autonomous Communities to others, which may mean modifying the wording of Article 7.

4. To legally develop the figure of Rehabilitation Agent and the Rehabilitation Offices

Justification

Renovation support services play a crucial role in the implementation of housing and energy transition policies, acting as points of advice and comprehensive support for citizens in the processes of rehabilitation, energy efficiency and accessibility. However, the agents that provide them (Rehabilitation Agents and Rehabilitation Offices) suffer from an uncertain legal and financial framework that depends on the consecutive calls for aid.

Millin and Bullier's (2021) reflection on rehabilitation One-Stop-Shops (OSS) sheds light on the different models and the challenges they face. They identified the definition of the legal and institutional status of these services as one of the key issues for their long-term sustainability.

The importance of these agents is reflected in both the EED and EPBD directives, which recognise their role as of vital importance in facilitating, scaling up and channelling renovation funds for the residential sector. On the other hand, RD 853/2021 included for the first time the figure of the Rehabilitation Agent, linked to the management of Next-Generation aid. With a similar approach to the latter, the Plan includes this figure. In addition, it allows a large part of the aid and management to be channelled through public or social rehabilitation offices (Article 9).

Faced with the construction of new construction, new market agents are emerging focused on renovation, whose models, training, responsibilities and rights are not clearly defined legislatively. The incorporation of these agents in the Building Regulation Law, their recognition as of general interest, or other legislative instruments, must give them legal certainty beyond the successive royal decrees on aid.

Proposal 1: develop the figure of the 'Rehabilitation Agent'

It is proposed to incorporate an additional provision that urges the MIVAU to develop specific legislation (possibly by modifying the Organic Building Law) with the criteria to create an official register of entities (similar to ECCEs) that meet minimum conditions that ensure the quality of the service and, at the same time, guarantee the economic viability of the model of these entities.

It must include responsibilities, obligations and rights, similar to how the framework of delegated subjects has been defined in the framework of CAE or Energy Service Companies (ESCOs) by Royal Decree 56/2016 (Article 7). The requirements must be balanced, to ensure quality, but without strangling an offer that is still incipient. One option is a 'scaled' system according to its portfolio of services, proven experience, trained personnel and above all contractual guarantees.

Proposal 2: Develop the framework for Rehabilitation Offices

It is proposed to include in the State Housing Plan as an additional provision or within article 9 or 10, that the services of the Rehabilitation Offices be formally recognized as Services of General Interest, and in which cases they are Services of General Economic Interest (SGEI) or Social Services of General Interest (SSIG).

This recognition would provide these offices with greater institutional legitimacy, stability and efficiency in their operation, making it easier for public administrations – especially local and regional ones – to offer and finance these services in a sustainable way and in accordance with the European regulatory framework. This consideration is already applied in other countries of the European Union, such as France, where the qualification of certain support and advisory services in energy rehabilitation has allowed a better articulation between public objectives, territorial actors and financing.

The relationship of these with the figure of the rehabilitating agent should be included in the definition. To this end, it is proposed that the services that the offices would offer under this figure be defined, understanding that 'Rehabilitation Agent' is an agent (or role) of the renovation whose definition is linked to the services offered.

5. Non-taxation of aid in the taxable income base

Justification

The receipt of aid, especially in vulnerable households, can pose a great economic problem for families, who after receiving it must pay taxes on their increase in wealth. In some cases, this is especially serious when going from a situation of being exempt from filing the Income Tax Return (minimum threshold) to having to file it because they have received aid.

It is incomprehensible that state aid that should be allocated to vulnerable households has a pernicious effect, precisely more so in this type of situation.

Proposal

The definitive elimination of taxation on aid for the renovation of buildings is proposed. To all intents and purposes, pensions, benefits, social bonuses and other benefits must be shielded from the receipt of this aid.

6. Prioritization of vulnerable households in access to aid

Justification

European directives insist on the importance of focusing public renovation funds on situations of energy poverty and vulnerability, while tackling social inequality and 'worst-performing buildings'. The experience of the Next-Generation funds is that, although vulnerability was considered, the greatest recipients have been the middle classes with the capacity to manage the aid. The lower classes have not had the funds available due to lack of knowledge or social support.

In the draft of the Plan, aid for rehabilitation in homes in vulnerable situations (Art.38.5) is left to the discretion and action of the Autonomous Communities, which can complete the general aid in a separate file. This leads to an increase in bureaucracy in this type of situation and does not solve the deficiencies identified above.

Proposal

It is proposed to link the extra aid for vulnerability to homogeneous criteria for all the Autonomous Communities, linked to the receipt of other social aid such as the Thermal or Electricity Social Bonus, unemployment benefit, low disposable income (IPREM/IRPF), etc. These criteria should not be exclusive, but rather that meeting any of them should allow access to vulnerability aid. This could reduce bureaucracy, by justifying eligibility easily and avoiding developing a new file.

On the other hand, the aid should be advanced to meet the costs and in no case should the aid be considered in the taxable income base, since in vulnerable households it will mean an increase in income and harmful effects on families.

7. Establish safeguards for renovation for vulnerable households

Justification

The Energy Performance of Buildings Directive (EPDB) clearly stipulates that incentives granted for the renovation of dwellings must equally benefit landlords and tenants of dwellings, which must be translated into measures to prevent the expulsion of the latter. Although it is a phenomenon that has not yet occurred, or has not been collected, in the case of Spain, there are other Member States of the European Union in which rehabilitation processes, particularly on a large scale, have led to eviction processes for rehabilitation (*renoviction*).

Proposal

It is proposed to link the granting of renovation aid in the case of homes that are rented to the maintenance of the rental price for a period of 5 years when the landlord is a natural person and in 7 years when it is a legal person.

What is EU Peers?

EU Peers is the European Community of Practice supporting the development and impact of One-Stop Shops for residential energy renovation. With more than 300 members across Europe (as of Oct. 2025), we are organised into six national Community platforms (Spain, Ireland, Italy, France, Hungary and the Baltic States) and one European transnational platform.

The overall objective of EU Peers is to support the development of IHRS as key instruments to facilitate and accelerate energy renovation of homes in the European Union. To this end, the Community carries out knowledge exchanges, identification of success stories, training and debates on the state of the sector in each of the participating countries.

The members of the Community in Spain, coordinated by [Green Building Council Spain (GBCE),](#) are organizations that offer or support renovation services such as one-stop shops, rehabilitation agents, financial services, architects, etc.

The EU Peers project has received funding from the European Union's LIFE Programme under Grant Agreement No 3875032 and runs from September 2023 to August 2026.

We are ready to act

The organisations that are part of EU Peers work every day to make the transformation of buildings in Spain into a more accessible, healthy, resilient and decarbonised built stock a reality.

We are at the disposal of the Ministry of Housing and Urban Agenda to collaborate in the development of the National Building Renovation Plan, contributing our experience and knowledge to design the best and most efficient public policies for the future.

EU Peers Members