

EFA's response to the European Commission public consultation on a European Affordable Housing Plan (Directorate General for Energy)

The European Federation of Allergy and Airways Diseases Patients' Associations (EFA) represents more than 200 million people living with allergy, atopic eczema, asthma and chronic obstructive pulmonary disease (COPD) across Europe. We bring together 48 national associations from 28 countries, channelling their knowledge and demands to the European institutions. We connect European stakeholders to ignite change and bridge the policy gaps on allergy and airways diseases so that patients live uncompromised lives, have the right and access to the best quality care and a safe environment.

EFA welcomes the development of an EU legislative and non-legislative framework in the area of housing. Housing is one of the key challenges of our days, presenting all the features of a crisis, and affecting all European countries. Identifying and taking steps to address this challenge is instrumental to social cohesion, economic growth and the protection of the most vulnerable. We are therefore glad that the Commission decided, at the start of the current mandate to turn housing into a key portfolio topic appointing, for the first time, an EU Commissioner for Energy and Housing.

People spend between 80-90% of their time indoors, a significant part of this being at home¹. The COVID-19 pandemic and the ensuing shifts in employment methods reflected by the possibility of teleworking, further increased the time people spend in their private residences. Exposures to diverse domestic pollution sources such as heating and cooking, construction materials, tobacco smoke and mould have been associated with symptom exacerbations, hospitalisations and even mortality due to allergy, asthma and COPD^{2,3,4}.

In addition, housing is becoming increasingly important to public health due to climate change, as demonstrated by the WHO in its 2018 Housing and Health Guidelines, noting the potential impact for people living with allergy and airways diseases⁵.

In this light, it is essential to see **housing conditions as a key health determinant**, and factors that influence Indoor Air Quality (IAQ), including heating, ventilation, air-conditioning (HVAC), insulation, and building materials emerge as inherent elements of a much-needed effort to ensure health at home.

¹ S. Dimitroulopoulou et al., Indoor air quality guidelines from across the world: An appraisal considering energy saving, health, productivity, and comfort, 2023

<https://www.sciencedirect.com/science/article/pii/S0160412023004002>

² Asthma & Lung UK, <https://www.asthmaandlung.org.uk/living-with/indoor-air-pollution/home>

³ European Academy of Allergy and Clinical Immunology (EAACI), *EAACI Guidelines on Environmental Science for Allergy and Asthma – Recommendations on the impact of indoor air pollutants on the risk of developing asthma or asthma-related outcomes*, 2024 <https://eaaci.org/wp-content/uploads/2024/11/for-public-comment-EAACI-Guideline-on-indoor-pollution-1.pdf>

⁴ European Respiratory Society, Respiratory health and indoor air pollutants based on quantitative exposure assessments, 2012 <https://publications.ersnet.org/content/erj/40/4/1033>

⁵ World Health Organisation, Housing and health guidelines, 2018 <https://www.who.int/publications/i/item/9789241550376>

Therefore, while affordability is certainly an important driver of the ongoing crisis, the EFA community of allergy, asthma and COPD patients emphasises the need to **establish the conditions and frameworks that enable healthy housing, making sure that indoor air quality (IAQ) becomes a central element of housing policies across Europe.**

Below you will find some key considerations from the perspective the EFA patient community, providing deeper insight into our responses to the public consultation questionnaire.

1. Make health a central element of housing policies across Europe

EFA invites the European Commission to look beyond just affordability and **prioritise the integration of health criteria, including IAQ considerations, into national housing policies, schemes and tools.** Healthy housing decreases human suffering, including burden related to both physical and mental health.

Yet aside from the associated health gains, ensuring healthy housing bears significant co-benefits: **Economic**, as it prevents the financial burden of unhealthy housing for both healthcare systems and individuals, including high costs for healthcare and medicines, increased energy costs for the households, substandard work performance and absenteeism; **Social**, as it can be used as a tool to address social inequalities, ensuring everyone's access to housing conditions that protect health and wellbeing; **Political**, as it can increase trust to the institutions that enabled the improvements at the different governance levels; and of course for **climate**, given that healthy houses means reduced emissions and a better environmental and climate footprint of the building stock.

To enable the integration of health and IAQ criteria into housing policies, EFA calls the European Commission to:

- Enable the **insertion of health-related provisions**, including on indoor air, humidity and temperature, into national laws governing building projects: from design and construction, to management, condition assessment and maintenance of buildings
- Encourage national **social housing schemes to focus on the health of vulnerable populations** by prioritising decent, accessible, and safe housing, and streamlining the inclusion of chronic conditions associated with indoor air pollution, such as allergy, asthma and COPD into the eligibility criteria for social housing
- Make **funding available for health-based renovations, upgrades and interventions**, including on old and polluting heating and cooking systems
- Prioritise residents' **information on health aspects of housing** e.g. by establishing a mandatory IAQ certificate for all new buildings and major renovations
- Ensure **well-functioning, energy-efficient heating, ventilation, and air conditioning (HVAC) systems** in all new residential buildings, based on frequent mandatory inspections and maintenance, regular checks for filter efficiency, and measures to ensure healthy humidity levels indoors
- **Promote green public housing** (for example via the European Bauhaus initiative), including home-based interventions and practices that benefit health e.g. reducing exposure to triggers like dust mites, mold, and pet dander through specific actions like

encasing mattresses and pillows, regular cleaning to reduce dust, controlling humidity, fixing water leaks, removing carpeting, and using air purifiers

- Develop a **Healthy Materials Registry** to identify and promote low-emission paints, sealants, flooring, and insulation

2. Fill-in the educational and knowledge gaps

Awareness paves the way to action, and housing policy is not an exception⁶. The EU Affordable Housing Plan presents a key opportunity to deal with the persistent gaps in knowledge and education on the impact on housing on our health. Despite an increasing body of evidence showcasing, **public awareness on the diverse impact of polluted homes seems to remain low or incomplete at best**^{7,8}. As a result, the importance of healthy housing is often overlooked or under-recognised by policymakers, as well as other relevant stakeholders.

Importantly, awareness should focus on specific highly-polluting practices, such as the burning of solid fuels and smoking and poor ventilation; but also on actionable changes households can make, including improving the ventilation, choosing cleaner heating and cooking appliances, controlling moisture, dampness and mould. Vulnerable populations such as children, pregnant women and chronic respiratory patients should be particularly targeted and involved.

To fill-in the existing educational and knowledge gaps around healthy housing, EFA invites the Commission to:

- Raise **awareness on the impact of unhealthy houses** on high-risk population groups. Actions should target key stakeholders in the area of housing policy, including policymakers, developers, architects and healthcare professionals.
- Support **educational campaigns and national programmes on healthy housing**, including key aspects such as ventilation (natural vs mechanical), insulation, energy efficiency, and keeping living environments allergen-free
- Further advance **public knowledge on how IAQ affects respiratory health**, building on the successful example of existing EU-funded projects e.g. IDEAL Cluster⁹
- Enable more systematic **incorporation of social determinants of health**—including housing quality indicators—in clinical and public health assessments to support earlier diagnosis and targeted intervention in populations exposed to poor housing environments.
- **Leverage local sources**, such as local health clinics, patient associations, schools and public services to deliver information on healthy housing, given that people tend to trust local sources more.

⁶ E. Nix et al. Getting to effective housing policy for health: a thematic synthesis of policy development and implementation, Cities Health, 2024 <https://pmc.ncbi.nlm.nih.gov/articles/PMC11441398/>

⁷ S. A. Robert, A. Y. Liu, 'Changes in public awareness of the social determinants of health over 15 years in Wisconsin, United States', Prev Med Rep, 2025 <https://pubmed.ncbi.nlm.nih.gov/39886083/>

⁸ E. Elnagar et al. 'Creating a comprehensive framework for design, construction and management of healthy buildings', 2024 https://build-up.ec.europa.eu/en/resources-and-tools/publications/healthy-buildings-toward-new-awareness?utm_source=chatgpt.com

⁹ IDEAL Cluster, Indoor Air Quality and Health <https://www.idealcluster.eu/>

3. Ensure accessible research and innovation for healthy houses

Still today, technologies linked to healthy housing and IAQ remain highly inaccessible to most people, mainly due to weak regulatory standards, lack of knowledge and high upfront costs^{10,11}. In addition, people often have to deal with dilemmas between air quality and energy efficiency, lack of trained technicians at the local level, and difficulties with old buildings, which collectively limit access to and consistent use of IAQ-related technologies such as sensors, filtration etc.

To enable a better uptake of technology and innovative solutions for healthy houses, EFA urges the European Commission to:

- Involve **vulnerable communities in IAQ research and innovation**, to ensure that their needs and concerns are reflected at all stages, from design to implementation.
- Support and accelerate **research into emerging IAQ technologies** with capacity to detect and decontaminate indoor settings from airborne pathogens e.g. ventilation/filtration, aerosol samplers etc

4. Enable collaboration among stakeholders

Multi-stakeholder collaboration across sectors is key. Engaging with relevant stakeholders is not just a democratic duty, but a tool to maximise the effect of a given policy and enhance its implementation on the ground. This is especially so in policy areas such as housing, where the involved stakeholders are heterogeneous, including the building industry, local authorities, but also grassroots associations of vulnerable communities, tenants, families and citizens.

In this context, involving patient organisations in housing policies brings **a unique perspective on the table: that of the lived experience**. Through surveys, testimonials and digital material, patient organisations can spread the word about how it is to live in an unhealthy house, and the policy change needed.

Some good examples of inter-sectoral dialogue include: the Finnish Indoor Air and Health Programme 2018–2028 run by the Finnish Institute for Health and Welfare (THL) gathering representatives from different organisations through society, for example Ministry of Social Affairs and Health, Occupational Health Institute and third sector as patient and professional organisations around the same table to discuss IAQ issues¹²; the Catalan Inter-Ministerial Public Health Plan (PINSAP), involving local committees made up of primary care providers, public health professionals, community organizations, social services, municipal authorities, and civil society groups working together to address complex health and social issues, such as

¹⁰ M. Acklin et al., 'Healthy homes: Stakeholder perspectives on housing interventions to reduce environmentally mediated infections', PLOS Glob Public Health, 2025
<https://pmc.ncbi.nlm.nih.gov/articles/PMC12011249/>

¹¹ C Souaid et al. 'Barriers and drivers to the uptake of innovative, affordable, and zero-energy dwellings in Belgium and Ireland', 2020 <https://iopscience.iop.org/article/10.1088/1755-1315/588/3/032017/pdf>

¹² Finnish Institute for Health and Welfare, 'The Finnish Indoor Air and Health Programme 2018–2028', <https://thl.fi/en/research-and-development/research-and-projects/the-finnish-indoor-air-and-health-programme-2018-2028>

social isolation and the inclusion of older people¹³; and the Sarajevo Canton's 10-year strategy to cut household heating emissions by 90%: involves government, municipalities, homeowners; includes energy efficiency, heating fuel change and emission regulation¹⁴.

The EU Housing Plan should be underpinned by permanent structures promoting dialogue and exchange among multiple stakeholders. Among others, the European Commission must:

- Promote **cross-sectoral dialogue among all relevant stakeholders**, including home developers, constructors, architects, tenants' associations and vulnerable communities.
- Facilitate across and within countries the **sharing of good practices** – frameworks and policies with a proven success record in ensuring high IAQ levels in residential houses.
- Support communities-driven initiatives, including of patient organisations, to **lead the organisation of discussions** on housing and respiratory health; **generate their own community-based data; translate research data and guidelines** in lay language; as well as **actively engage** in national housing programmes

We would like to thank our members that provided input to this EFA response, namely the Austrian Lung Union; AAA Bosnia and Herzegovina; the Finnish Organisation for Respiratory Health; the Polish Federation of Asthma, Allergy and COPD Patients' Organisations; the Slovenian Atopic Dermatitis Association; the Spanish Federation of Respiratory Diseases' Associations; and the Spanish Association for People with Food and Latex Allergy.

¹³ A. Mateu I Serra, Health in all policies and intersectorality in health promotion: the Public Health Interdepartmental Plan of Catalonia, Med Clin, 2015 <https://pubmed.ncbi.nlm.nih.gov/26711060/>

¹⁴ EU Build-Up: The European portal for energy efficiency and renewable energy in buildings, 'Household heating emissions to be cut by 90% in Sarajevo', 2024 <https://build-up.ec.europa.eu/en/news-and-events/news/household-heating-emissions-be-cut-90-sarajevo>