European Commission

ROMA CIVIL MONITOR

Roma equality and inclusion in Europe's green transition: Energy poverty in Czechia, Hungary, Ireland and Slovakia

by Eva Schwab

Prepared by:

CEU Democracy Institute

December 2023

Justice and Consumers

EUROPEAN COMMISSION

Directorate-General for Justice and Consumers
Directorate D – Equality and Union Citizenship
Unit D Non-Discrimination and Roma Coordination

European Commission
B-1049 Brussels

EUROPEAN COMMISSION

Roma equality and inclusion in Europe's green transition: Energy poverty in Czechia, Hungary, Ireland and Slovakia

by Eva Schwab

Directorate-General for Justice and Consumers
2024

Manuscript completed in March 2024

PDF	ISBN 978-92-68-20558-7	doi: 10.2838/5311806	Catalogue number DS-01-24-001-EN-N

How to cite this report:
Roma Civil Monitor (2024) *Roma equality and inclusion in Europe's green transition: Energy poverty in Czechia, Hungary, Ireland and Slovakia*. Publications Office of the European Union, Luxembourg. By Eva Schwab.

Luxembourg: Publications Office of the European Union, 2024

This transnational thematic report was written by Ms Eva Schwab (Democracy Institute of Central European University).

Section 4.2. *Energy Poverty* contains sections with joint authorship. The country case study on Czechia contains written contributions by Mr Jan Husák, and the country case study on Slovakia contains written contributions by the Community Center for Minorities, Veľký Krtíš.

Ms Anna Bajomi from FEANTSA provided valuable comments on the report.

The draft was proofread by Mr Simon John Milton.

The report was prepared as part of the initiative '*Preparatory Action – Roma Civil Monitoring – Strengthening Capacity and Involvement of Roma and pro-Roma Civil Society in Policy Monitoring and Review*' implemented by a consortium led by the Democracy Institute of Central European University (DI/CEU), including the European Roma Grassroots Organisations Network (ERGO Network), the Fundación Secretariado Gitano (FSG) and the European Roma Rights Centre (ERRC). The initiative was funded by the European Commission's Directorate-General Justice and Consumers (DG JUST) under service contract no. JUST/2020/RPAA/PR/EQUA/0095.

The report represents the author's findings and does not necessarily reflect the views of the consortium or the European Commission, which cannot be held responsible for any use that may be made of the information contained herein.

CONTENTS

LIST OF ABBREVIATIONS

BER	Building Energy Rating
CEE	Central Eastern Europe
CSO	Civil Society Organisation
DECC	Department of the Environment, Climate and Communications (Ireland)
EEA	European Environment Agency
EEB	European Environment Bureau
EED	Energy Efficiency Directive
EEOS	Energy Savings Obligation Schemes
EGD	European Green Deal
EPAH	Energy Poverty Advisory Hub
EPBD	Energy Performance of Buildings Directive
ERDF	European Regional Development Fund
ESRI	Economic and Social Research Institute (Ireland)
ETC/CCA	European Topic Center Climate Change Adaptation
EURSF	EU Roma Strategic Framework on Equality, Inclusion and Participation
EU SILC	EU Statistics on Income and Living Conditions
HAP	Housing Assistance Payments
HBS	Household Budget Survey
HfHH	Habitat for Humanity, Hungary
HNSIS	Hungarian National Social Inclusion Strategy
JTF	Just Transition Fund
MABS	(National Traveller) Money Advice and Budgeting Service (Ireland)
MPRN	Meter Point Registration Number
MRC	Marginalised Roma Communities
MS	(EU) Member State
NECP	National Energy and Climate Plan
NRRP	National Recovery and Resilience Plan
NRSF	National Roma Strategic Framework
NSCP	National Social Climate Plan
NTRIS	National Traveller and Roma Integration Scheme
RESDI	Roma Environmental Sustainability Development Initiative
RONI	Regulatory Office for Network Industries (Slovakia)
SCF	Social Climate Fund
SEIA	Sustainable Energy Authority of Ireland
SHDF	State Housing Development Fund (Slovakia)
SWD	(EC) Staff Working Document

1. INTRODUCTION

With the 2020 report *Pushed To The Wastelands*, the European Environmental Bureau (EEB) presented evidence of how anti-Roma racism leads to unequal exposure to environmental harm and access to basic services. The authors produced an extensive map of cases documenting three distinct categories of environmental injustice: (1) "cut-off", when Roma are cut off from environmental services (such as a water supply, sewage system, or waste collection),[1] (2) "put in danger", when Roma end up living in polluted areas, and (3) "pushed aside", when Roma are subjected to forced evictions for environmental upgrading projects. In some of these cases, institutions such as local governments or international organisations have used explicitly racist tropes to justify the exposure to harm. In Hungary, the municipality of Ózd turned off public water taps during summer in the middle of a heatwave, and the local authorities justified this by accusing the inhabitants of a Roma settlement (for whom this was the only source of water) of "water misuse".[2] Another example is the case of exposure to lead contamination, where the United Nations Mission in Kosovo (UNMIK) justified this unequal exposure in racist ways that put the blame for the pollution on the Roma themselves.[3] The significant exposure of Roma to environmental hazards documented in this report is compounded by their greater vulnerability to falling ill due to poor access to health services and poverty. In concluding, the authors of the EEB report argue that "environmental conditions are one of the contributing factors to the difference in life expectancy"[4] between Roma and non-Roma populations in Eastern Europe. In 2023, the EEB presented a follow-up report with case studies from Western Europe, including examples of racist ways of legitimating the withholding of electricity connection for a Roma settlement in Spain.[5]

In the course of the green transition, the governance of the environment and basic services in the EU will increasingly undergo substantial change. The European Green Deal (EGD) was adopted in 2019 to make Europe the first climate-neutral continent, preserve economic growth and "leave no one behind". The goal of a just transition is supported by earmarked funding and several policy initiatives. Most notably, the 'Just Transition Fund' (endowed with

[1] The category "cut-off" includes cases when such services did not exist (or at least we do not have the historical records to show that they existed priorly) and cases for which we have evidence that services were actively discontinued. The first category includes the case of Roma living in segregated settlements who are the only ones in a municipality not to receive (adequate) environmental services. In some instances, segregation has been reinforced in recent years, such as in Sajokaza (Hungary), where a wall was built around a segregated Roma settlement in 2018.

[2] The case is documented in the Roma Environmental Justice Atlas: https://ejatlas.org/conflict/roma-blamed-for-water-misuse-the-city-council-disconnects-water-supply-in-hetes-and-kiserdo-telep-ozd-hungary

[3] In 2016, the Human Rights Advisory Panel (HRAP), a legal body created by the UN to assess the organisation's responsibility for human rights violations in Kosovo, issued a landmark decision finding – that UNMIK was responsible for the prolonged exposure of Roma communities to toxic lead. Additionally, the Roma were the only ethnic group housed in contaminated camps, and the UNMIK Special Representative of the Secretary-General (SRSG) made a discriminatory statement that there was only so much that UNMIK could do to improve the complainants' health, considering their "unhealthy or risky lifestyles" which the SRSG maintained were "the main source of lead poisoning in the camp" but offered no supporting evidence (66). Therefore, this case was found to amount to unlawful discrimination (N.M. v. UNMIK, Case No. 26/08, Hum. Rts. Advisory Panel, Opinion (Feb. 26, 2016)), https://media.unmikonline.org/hrap/Eng/Cases%20Eng/26-08%20NM%20etal%20Opinion%20FINAL%2026feb16.pdf). Despite this landmark decision, the Roma communities affected by the lead poisoning are still waiting for redress (U.N. Office of the High Commissioner for Human Rights [OHCHR], UN must urgently provide redress for minorities placed in toxic Kosovo camps, says UN rights expert (Mar. 13, 2019), https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=24319&LangID=E).

[4] P. Heidegger and K. Wiese, 'Pushed to the Wastelands: Environmental Racism against Roma Communities in Central and Eastern Europe' (Brussels: European Environmental Bureau, 2020), 18.

[5] Diego Marin, 'Bearing the Brunt: Roma and Traveller Experiences of Environmental Racism in Western Europe' (European Environmental Bureau, January 2024), https://eeb.org/wp-content/uploads/2024/01/roma-report-WEB-1.pdf.

17.5 billion EUR for the period 2021-2027) addresses regions and workers hit by the decarbonisation of industry. The 'Social Climate Fund' (expected to provide about 86.7 billion EUR for the period 2027-2032) aims to support low-income households as Europe introduces carbon taxation to the housing and transport sectors starting in 2027. Policy initiatives include the 2022 Council Recommendation on a fair transition, which calls for policy packages to consider the most affected groups, in particular people and households in vulnerable situations, notably people furthest removed from the labour market – for instance, due to their skills, territorial labour market conditions or other characteristics, such as racial or ethnic origin. Moreover, people and households in vulnerable situations may include those living in or at risk of poverty and/or energy poverty, those facing barriers to mobility, or those who are overburdened with housing costs.[6] The Council Recommendation includes a broader reflection on the need "to review and, where applicable, adapt social protection systems, including social inclusion policies, in view of the employment, social and health challenges posed by the green transition".[7]

Just transition is a separate pillar of the EGD and not a horizontal goal. The extent to which justice considerations have been integrated into the single pillars of the EGD since its adoption varies and will be discussed for one concrete policy field below. The just transition has also not yet been systematically mainstreamed across policy initiatives other than the EGD. Most notably, the 'EU Anti-racism Action Plan' 2020-2025 acknowledges that high levels of inequality among people with a minority, racial or ethnic background present an obstacle to sustainable development.[8] However, just transition policies – so far – have not addressed the risks that racism poses to sustainable development and how to ensure racial equality throughout the green transition.[9] The 'EU Roma Strategic Framework for Equality, Inclusion and Participation for 2020 - 2030' (EURSF) includes one important section on environmental justice. Annexe 1 addresses unequal exposure to harm as well as unequal access to basic services through the measure of desegregation. While this is important, what is lacking is a careful evaluation of the current green transition policies that impact Roma equity and inclusion. The lack of integration of just transition principles across policy fields has been the subject of criticism: to date, the social justice dimension has been addressed largely in a compensatory manner expressed by the JTF and SCF, while more substantive treatment and the creation of synergies is missing.[10] The most obvious example of this is the SCF, which aims to compensate for the planned extension of carbon taxation in the housing and transport sector. The carbon taxation in the housing sector will hit low-income

[6] Council of the European Union, 'Council Recommendation on Ensuring a Fair Transition towards Climate Neutrality', 7 June 2022, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0627(04).

[7] Council of the European Union, art.6b.

[8] European Commission, 'A Union of Equality: EU Anti-Racism Action Plan 2020-2025', Communication from the Commission (Brussels, 2020), https://commission.europa.eu/document/download/beb25da4-e6b9-459e-89f7-bcdbd3a8f0c8_en?filename=a_union_of_equality_eu_action_plan_against_racism_2020_-2025_en.pdf.

[9] Civil Rights Defenders, 'Unnatural Disaster: Environmental Racism and Europe's Roma' (Civil Rights Defenders, 2023), https://crd.org/wp-content/uploads/2023/04/UnnaturalDisaster-report2023.pdf.

[10] Sebastiano Sabato and Josefine Vanhille, 'The European Green Deal and the "Leave No One Behind" Principle. State of the Art, Gaps and Ways Forward', OSE Paper Series (European Social Observatory, 2024), https://www.ose.be/publication/european-green-deal-and-leave-no-one-behind-principle; Darren McCauley and Kerry Andrea Pettigrew, 'Can Europe Lead a Just Transition? Strengthening Social Justice in the European Green Deal by Using European Pillar of Social Rights Indicators' (SOLIDAR, 2022), https://www.solidar.org/publications-page/can-europe-lead-a-just-transition-thematic-pub/.

households the hardest as they inhabit the least energy-efficient housing.[11] One important way to integrate just transition considerations across these policy fields is by improving the representation and participation of the marginalised in the consultations.[12]

This present report was developed in cooperation with (pro-) Roma civil society organisations and analyses one specific just transition policy field from the perspective of Roma equality, inclusion and participation. The policy field was selected in cooperation with the RCM consortium of (pro-) Roma CSOs. Based on an initial list of potential policy fields regarding the just transition and Roma environmental justice developed by the author of this report, as well as attendance at two conferences on the environmental injustices faced by Roma communities, the CSOs unanimously chose the topic of energy poverty. The reason for this choice may be attributed to the convergence of two factors: one is that energy poverty is related to the field of housing, where (pro-) Roma CSOs have advocacy experience. The other is that energy poverty is one of the areas where policy-making efforts to integrate just transition principles are among the more advanced.

The European Roma Strategic Framework for Equality, Inclusion and Participation (EURSF) creates the basis for addressing energy poverty. It aims to directly contribute to achieving the goals defined in the European Pillar of Social Rights, specifically Principle 20, the right to access essential services of good quality, including energy, as well as the UN Sustainable Development Goals, specifically SDG 7, access to affordable and clean energy.[13] In the Staff Working Document (SWD) accompanying the Commission's Assessment report of National Roma Strategic Frameworks (NRSF), the Council Recommendation calls on Member States (MS) to ensure the equal treatment of Roma in accessing adequate, non-segregated housing and essential services, including energy.[14] However, more concrete provisions and analysis of the situation of Roma in terms of energy poverty are currently lacking.

This present report analyses the problem of energy poverty through case studies from four countries: Czechia, Hungary, Ireland, and Slovakia. It is based on desk research, expert interviews and case studies crafted in collaboration with (pro-) Roma civil society organisations (CSOs). The selection of these countries followed the input we received from CSOs. While all (pro-) Roma CSOs from the RCM consortium were invited, only three contributed (Czechia, Ireland, and Slovakia). Additionally, we reached out to several CSOs active in the area of environment, social protection, and/or racial equality from countries where the respective NRSFs have included substantial treatment of environmental justice (Spain, Hungary, and Croatia). Of these countries, only Hungary (Habitat for Humanity, Hungary) responded.

We have complemented the case studies we received from the CSOs with additional interviews with green CSOs (five interviews) and an analysis of key national policy

[11] Anna Bajomi, Brook Riley, and Caroline Simpson, 'The People behind the Buildings: Why We Must Get It Right in the EPBD', *Www.Euractiv.Com*, 12 May 2023, https://www.euractiv.com/section/buildings/opinion/the-people-behind-the-buildings-why-we-must-get-it-right-in-the-epbd/.

[12] EQUINET, 'Preliminary Assessment of the EU Green Deal's Impact on Equality. Survey of Current Practices and Needs of European Equality Bodies' (Equinet, European Network of Equality Bodies, 18 September 2023), https://equineteurope.org/publications/preliminary-assessment-of-the-eu-green-deals-impact-on-equality-survey-of-current-practices-and-needs-of-european-equality-bodies/.

[13] European Commission, 'A Union of Equality: EU Anti-Racism Action Plan 2020-2025'.

[14] European Commission, 'Assessment Report of the Member States' National Roma Strategic Frameworks', Staff Working Document, SWD(2023) 3 Final (Brussels, 9 January 2023), https://eur-lex.europa.eu/resource.html?uri=cellar:ece09ce3-9006-11ed-b508-01aa75ed71a1.0001.02/DOC_1&format=PDF.

documents – NRSFs, National Energy and Climate Plans (NECPs) – and energy poverty mitigation strategies, where applicable.

2. EU Frameworks and legislation for energy poverty

At the EU level, the energy poverty concept was mentioned explicitly for the first time in the first Directive on common rules for the internal market for electricity (the 'Electricity Directive' 2009/72/EC, repealed) and the Gas Directive (2009/73/EC), which called on the MS to "develop national action plans or other appropriate frameworks to tackle energy poverty" and define "vulnerable customers" and protect them. In 2016, the Clean Energy for All Europeans legislative package included Regulation (EU) 2018/1999 on the Governance of the Energy Union and Climate Action (the 'Governance Regulation'). This Regulation required MS to assess the "number of households in energy poverty" and include this assessment in their National Energy and Climate Plans (NECPs). If the assessment reveals a significant number of energy-poor households, the MS concerned must integrate into their NECPs a national indicative objective for reducing energy poverty, and outline policies and measures for addressing energy poverty (including timeframes), and report progress to the Commission.

The 2019 revised Electricity Directive recalls the MS' obligation to assess the number of households in energy poverty (Article 29) under the Governance Regulation, obliging the MS to "establish and publish a set of criteria, which may include low income, high expenditure of disposable income on energy, and poor energy efficiency of their homes". The revised Electricity Directive also allows for public interventions in price-setting associated with the supply of electricity to energy-poor or vulnerable household customers (Article 5) and extends the obligation to report on the number of energy-poor households to the MS that apply such interventions (Article 5(5)). Further, Article 28 obliges the MS to protect their vulnerable customers and ensure that adequate safeguards are in place, such as the prohibition of electricity disconnection at critical times, transparency regarding contractual terms and conditions, general information and dispute settlement mechanisms, benefits associated with social security systems, support for energy efficiency improvements and other measures addressing energy poverty, including in the broader poverty context.[15] Article 10 obliges suppliers to provide household customers with adequate information on alternative measures to disconnection sufficiently in advance, such as "sources of support to avoid disconnection, prepayment systems, energy audits, energy consultancy services, alternative payment plans, debt management advice or disconnection moratoria [that do] not constitute an extra cost to the customers facing disconnection".

With the 2020 'Recommendation on Energy Poverty' and the accompanying SWD, the EC provided guidance for MS on how to assess and monitor energy poverty with direct indicators and obtain insight into the underlying causes (indirect indicators related to poverty, the state of buildings, and energy infrastructure).

Energy efficiency measures have targeted energy poverty since the adoption of the Energy Efficiency Directive (the 'EED' 2012/27/EU, last amended in 2023). In its provisions on the energy savings obligation, the EED requires MS to take account of the need to alleviate energy poverty – for instance, by requiring a share of national energy efficiency measures or alternative measures and programmes "to be implemented as a priority among vulnerable households, including those affected by energy poverty". Information about the outcome of

[15] Agnieszka Widuto, 'Energy Poverty in the EU. Briefing' (European Parliamentary Research Service, 2023), https://www.europarl.europa.eu/RegData/etudes/BRIE/2022/733583/EPRS_BRI(2022)733583_EN.pdf.

the measures aimed at alleviating energy poverty must be integrated into national energy and climate progress reports.[16]

Important changes to energy poverty policy were introduced in 2022 with the Council Recommendation on a fair transition, which proposed updates to the EED and the Energy Performance of Buildings Directive (EPBD).[17] The Council Recommendation urges MS to pay specific attention to particular groups that are more at risk of being affected by energy poverty, such as persons with disabilities, single parents, elderly people, children, and persons with a minority racial or ethnic background.[18]

The recast EED, adopted in June 2023,[19] contains the first European narrative definition of energy poverty and includes two household expenditure-based and two consensual, self-reported indicators. Despite this guidance, in October 2023, in its updated guidance on energy poverty, the EC still found that "most national energy poverty strategies limit their assessment and monitoring to the use of material deprivation indicators from the EU Statistics on income and living conditions".[20]

The EED recast (2023) introduces important provisions for increasing energy efficiency support to energy-poor households in line with the EGD's aim of "leaving no one behind". Article 8 of the EED recast requires MS to achieve energy savings "among people affected by energy poverty, vulnerable customers, low-income households and, where applicable, people living in social housing" through national or local policy measures. Before this change, the Directive asked MS to consider energy-poor households in their policy design to ensure the fulfilment of their obligation. In the EED recast, this recommendation includes the requirement to dedicate a proportion of national energy savings to households in energy poverty (Energy Efficiency Obligation Scheme, EEOS). This new requirement to target a portion of savings is associated with a requirement to report which measures have delivered these savings and to whom. This will improve the visibility of energy efficiency measures intended to alleviate energy poverty.[21]

The updated EPBD includes stronger measures targeting the renovation of buildings, with attention to the worst-performing buildings. Specifically, MS are required to ensure that "at least 55% of the decrease in the average primary energy use … is achieved through the renovation of the 43% worst-performing buildings" (EPBD Art.9b). It also requires MS to prioritise vulnerable groups when distributing support schemes and to address the problem of upfront costs. However, there is no ringfencing similar to the EED, so it is hard to guarantee that a proportional share of funding will arrive in the necessary form for energy-poor

[16] Widuto.

[17] The new EPBD was adopted in April 2024 and its implications will be discussed briefly in the conclusion. Hélène Sibileau and Volodymyr Vladyka, 'The EPBD Decrypted: A Treasure Chest of Opportunities to Accelerate Building Decarbonisation' (BPIE - Buildings Performance Institute Europe, May 2024), https://www.bpie.eu/wp-content/uploads/2024/04/082_BRIEF_The-revised-EPBD-%E2%80%93-decrypted_08.pdf.

[18] Council of the European Union, 'Council Recommendation on Ensuring a Fair Transition towards Climate Neutrality'.

[19] The EED has been revised as part of the European Commission's proposals to deliver the 55% carbon emissions reduction target by 2030, the REPowerEU plan to make Europe independent of Russian fossil fuels, and the European Green Deal.

[20] European Commission, 'EU Guidance on Energy Poverty', Commission Staff Working Document (Brussels, 20 October 2023), https://energy.ec.europa.eu/system/files/2023-10/SWD_2023_647_F1_OTHER_STAFF_WORKING_PAPER_EN_V5_P1_3016190.PDF.

[21] SocialWatt, 'Implementing the New Energy Efficiency Directive to Alleviate Energy Poverty. Policy Brief', 2023, https://socialwatt.eu/sites/default/files/news/EED%20Briefing_Implementing_the_new_Energy_Efficiency_Directive_to_alleviate_energy_poverty_FINAL.pdf

households occupying the worst-performing housing stock. The definition of the worst-performing housing stock is broad and the mandated share of energy savings low, risking that shallow renovations will be done to 'not-so-bad' buildings while the worst will be ignored. The prevention of displacement and evictions, especially in the whole-neighbourhood approach to renovations, is also not sufficiently addressed.[22] Finally, Article 17 of the updated EPBD provides that MS may decide not to apply the minimum energy performance standards to stand-alone buildings with a total useful floor area of less than 50 m^2. If implemented, this could exempt the homes of many Roma households.

The primary instruments through which the EC monitors the implementation of measures to alleviate energy poverty are the National Energy and Climate Plans (NECP) under Article 14 of the Governance Regulation. These were submitted to the EC for review for the first time in 2019 for the period 2021 to 2030 and are updated following a two-year cycle. The most recent round of updates was submitted in June 2023. All countries analysed for this report submitted their draft updated NECPs on time except for Ireland, which officially communicated only some elements of its draft updated NECP. The final updated NECPs are due by June 2024.[23]

According to the 2023 Guidance on Energy Poverty, MS are required to define three concepts in their NECPs[24]:

- "Vulnerable customer" according to Article 28 of the Electricity Directive 2019/944: "The concept of vulnerable customers may include income levels, the share of energy expenditure of disposable income, the energy efficiency of homes, critical dependence on electrical equipment for health reasons, age or other criteria." The concept of vulnerability is conceived from the perspective of a contractual "customer" relationship with an energy supplier". As such, vulnerable customer support measures do not benefit users of non-modern fuels such as firewood.
- "Household in energy poverty" according to the narrative definition of energy poverty newly adopted in the EED 2023/1791 (Article 2(52)), is "a household's lack of access to essential energy services, where such services provide basic levels and decent standards of living and health, including adequate heating, hot water, cooling, lighting, and energy to power appliances, in the relevant national context, existing national social policy and other relevant national policies, caused by a combination of factors including at least non-affordability, insufficient disposable income, high energy expenditure and poor energy efficiency of homes".
- "Vulnerable household" according to Regulation 2023/955, which establishes a Social Climate Fund, refers to "households in energy poverty or households, including low-income and lower-middle-income ones, that are significantly affected by the price impacts of the inclusion of greenhouse gas emissions from buildings within the scope of Directive 2003/87/EC and lack the means to renovate the building they occupy".

[22] FEANTSA, 'How to Avoid a Renoviction Wave. Report on the Social Impacts of the Renovation Wave', 2022, https://www.feantsa.org/public/user/Resources/reports/2022/1_How_to_avoid_a_Renoviction_wave.pd.

[23] Council of the European Union, 'Assessment of the Draft Updated National Energy and Climate Plans' (Brussels, 13 December 2023), https://data.consilium.europa.eu/doc/document/ST-16454-2023-INIT/en/pdf.

[24] European Commission, 'EU Guidance on Energy Poverty'.

The EC published its assessment of the draft updated NECPs in mid-December 2023. It concludes that "to address energy poverty, a vast majority of MS still need to set out clear objectives and a method for the definition and assessment of vulnerable households. Synergies with structural energy policies, particularly energy efficiency measures and a stronger framework for consumer empowerment to alleviate energy poverty, are equally not sufficiently explored".[25] Even though one of the defining documents of energy poverty, the EED recast, references minority ethnic background as a factor compounding vulnerability, the EC assessment of the treatment of energy poverty in the NECPs does not include this inequality dimension.[26]

In the recast EED, MS were asked to develop their NECPs in cooperation with local governments and CSOs. In this way, policies for tackling energy poverty should be better tailored to the needs of the affected households and more adapted to the multifold contextual settings that give rise to energy poverty. However, in the review process, the EC found that the NECPs rarely explained how consultations with the public and multilevel dialogue with regional and local authorities were conducted and what views these processes had contributed.[27] This is particularly problematic given the rarity of data collection on national and local energy poverty. Without detailed data on energy poverty or active participation from local governments and CSOs, most measures in the MS tend to focus on cost support, often lacking evidence-based targeting.

[25] European Commission, 'EU Wide Assessment of the Draft Updated National Energy and Climate Plans', Communication from the Commission (Brussels, 18 December 2023), https://commission.europa.eu/system/files/2023-12/EU-wide_assessment_draft_updated_National_Energy_Climate_Plans_2023.pdf.

[26] European Commission.

[27] European Commission.

3. COUNTRY STUDIES

The following case studies first clarify the state of defining energy poverty in the respective MS, the availability of data, the measures (cost-support and structural) and an assessment of the respective NECPs (and Energy Poverty Reduction strategy, in the case of Ireland). Specific case studies are then presented, including a description of measures that have been applied and their effect on Roma households in energy poverty, as assessed by local CSOs. Finally, the NRSF is evaluated to determine to what extent it reflects the challenges discussed in the case studies and is integrated with pre-existing policies and findings about energy poverty.

3.1. Czechia

Legal definition of energy poverty

In Czechia, there is no legal definition of energy poverty. The draft updated NECP was submitted to the EC in October 2023. It mentions that energy poverty will be defined in the final plan according to the EED recast. While there are social policy and consumer protection measures that address energy poverty in Czechia, the EC criticises the fact that the NECP does not contain a governance programme dedicated to energy poverty that would create synergies with structural policies in the areas of energy efficiency, building renovation, and access to renewable energy. As part of the obligation under Article 8 on the EEOS of the EED recast, the Czech draft updated NECP commits to set up instruments to ensure that energy efficiency improvements are also implemented for low-income groups, namely, through the New Green Savings Programme[28] However, the plan lacks quantification of measures intended to tackle energy poverty, national objectives, and a timeline with concrete milestones.[29]

The category of "energy vulnerable consumer" is very narrowly defined in the amendment to the Czech Energy Act as people with certain disabilities.[30]

The definition of energy poverty by the Ministry of Industry and Trade (2021) contains four elements (inability to keep the house adequately warm, outstanding energy bills, energy bills that consume a major part of income, and hidden energy poverty where energy expenditure is relatively low). Currently, the Czech Energy Act is undergoing revision.

Available data

According to EU SILC data from 2019, Czechia has one of the smallest proportions of households in energy poverty (5.5% according to the average of four indicators counted in EED recast). However, Czechia ranks third among EU countries for low-income households

[28] European Commission, 'Czech Draft Updated NECP 2021 2030', 2023, https://commission.europa.eu/publications/czech-draft-updated-necp-2021-2030_en.

[29] European Commission, 'Assessment of the Draft Updated National Energy and Climate Plan of Czechia', Commission Staff Working Document (Brussels, 18 December 2023), https://commission.europa.eu/system/files/2023-12/SWD_Assessment_draft_updated_NECP_Czechia_2023.pdf.

[30] Eva Mariničová et al., 'Tackling Energy Poverty in EU Member States', 2023, https://bankwatch.org/publication/tackling-energy-poverty-in-eu-member-states.

that spend the greatest share of their income on energy bills.[31] Moreover, disaggregated data from the Czech Statistical Office, opinion surveys and sociological studies indicate a higher incidence of energy poverty in low-income groups and peripheral parts of the country. Energy poverty is thus 'hidden' not only in relation to how the official definition describes it (as under-consumption) but also due to the strong centre-periphery division of the country: while the average level of energy poverty is low, it is quite high in certain locations.[32]

Tenants make up the largest share of energy-poor households in Czechia. According to the survey of living conditions from Spring 2021 (that is, before the energy crisis), the difference between tenants and owners in terms of the number of households with a "high probability of being energy poor" was 86% to 45%, respectively.[33] While people in rented housing account for only 16% of the total population of the country, they make up almost three times as large a share (46%) in terms of the population in fuel poverty.[34] The survey also clearly addressed the claim that energy poverty is a rural phenomenon affecting elderly people living in single-family houses. In Czechia, the vast majority of energy-poor households live as tenants. Four hundred thousand people in rented housing were energy-poor in 2021, half of whom were living in large cities with over 50,000 inhabitants. In comparison, only a tenth of this number of pensioners living in their own homes in rural areas were energy-poor (40,000).[35] There is a clear correlation between housing quality and energy poverty: "[Of] all apartments in Czechia that have not yet been insulated by any means, about one-third are inhabited by the lowest-income group and more than a half by the two lowest-income groups".[36]

While specific data on energy poverty among Roma living in socially excluded localities is unavailable, the structural conditions of these areas suggest a high incidence. According to a quantitative study from 2018[37], residents of socially excluded localities spend the highest portion of their income on housing. The majority of people in these localities are tenants in privately rented flats (41%), followed by 28.9% in municipally-owned flats, 15.9% in dormitories, 9.2% in privately owned flats, and only 3.4% in privately owned houses. A significant number of households are undergoing foreclosure proceedings, indicating an inability to service housing-related debt. Additionally, most households in socially excluded localities rely on traditional heating stoves, which contribute to indoor air pollution and increase housing costs due to lower efficiency and higher fuel expenses.

Measures

Currently, Czechia does not have specific policies or measures aimed directly at reducing energy poverty targeted at localities inhabited predominantly by Roma.

---

[31] European Commission, 'Study on Energy Prices and Costs. Evaluating Impacts on Households and Industry: 2023 Edition', 2023, 126, https://op.europa.eu/fr/publication-detail/-/publication/3b43f47c-e1c5-11ee-8b2b-01aa75ed71a1/.

[32] Hedvika Koďousková and Lukáš Lehotský, 'Hidden Energy Poverty: The Case of the Czech Republic', in *Perspectives on Energy Poverty in Post-Communist Europe*, ed. George Jiglau et al. (Oxon, New York: Routledge, 2021), 173–94.

[33] Hnutí DUHA, 'Energetická Chudoba a Její Řešení [Energy Poverty and Its Solution]' (Friends of the Earth Czech Republic, 2022), 9, https://hnutiduha.cz/sites/default/files/publikace/2023/01/soc_bydleni_finalni_jedna_strana_opr.pdf.

[34] Hnutí DUHA, 27.

[35] Hnutí DUHA, 26f.

[36] Koďousková and Lehotský, 'Hidden Energy Poverty: The Case of the Czech Republic', 176.

[37] Laco Toušek et al., 'Sociálně vyloučené lokality z pohledu sociodemografických ukazatelů', Demografie 60 (2018): 21–35.

As in most Central Eastern European countries, utility price cuts are the dominant measure for dealing with energy poverty in Czechia. These cuts are problematic not only because they do not currently target the most vulnerable customers but also because they focus on only certain fuel sources and not even those that are most used among energy-poor households. From their survey on living conditions, Friends of the Earth Czechia, in cooperation with the University of Ostrava, found that the current discounts on electricity and gas do not reach the majority of energy-poor households: "Just under 40% of all people in energy poverty in spring 2021 lived in households that heated with electricity or gas". [38] Particularly, those using district heating do not benefit from these discounts as 85% of their energy consumption (heating and hot water) is provided through district heating. Friends of the Earth recommends targeted price cuts. However, it will still be difficult to target vulnerable customers using district heating, as prices are calculated for entire buildings or even entire blocks. In the case of energy-poor households who use coal and wood as fuel sources, providing automatic targeted support is virtually impossible.[39]

While the new draft updated NECP mentions that energy poverty is greatest among tenants,[40] the energy efficiency upgrading programmes do not reflect these findings. Energy-efficiency upgrading programmes are directed at owners, and there are no support programmes for tenants. This is even more concerning, as investing in insulating rental apartments is much more efficient than insulating single-family houses.[41] The adoption of the 'Green Savings Light' programme financed by the 'EU Modernisation Fund' targeted owners of single-family homes who receive either an old-age pension, third-degree disability pension or housing allowance. The scheme supported roof insulation, floor insulation, window replacement and entrance door replacement. Applicants do not have to make upfront payments. One hundred per cent of the costs are covered by the state, making them more accessible to low-income households. Since April 2023, there has been additional support for buying thermal or photovoltaic systems for water heating.[42] The programme has serious shortcomings, as it does not support deep energy efficiency renovations or allow home-owner associations and housing cooperatives to apply (Interview Polanecky).

Friends of the Earth Czechia have made a list of concrete suggestions concerning how to integrate tenants into energy efficiency upgrading processes. In the interview, Polanecky outlined the potential of creating long-term contracts between tenants and owners as a precondition for accessing energy efficiency funding. When there is at least a three-year rental contract, owner and tenant could engage in some form of cost-splitting to overcome the so-called 'owner-tenant paradox' (while the cost of the energy renovation is borne by the owner, the benefits – the savings in energy costs – go to the tenant). But the problem is that "if you put one more requirement on landlords, they might stop renting altogether, then there [will be] even fewer flats available on the rental market, and the prices will go up even more" (Interview Polanecky). Currently, the rental sector is characterised by so-called 'chains of

[38] Hnutí DUHA, 'Energetická Chudoba a Její Řešení [Energy Poverty and Its Solution]' (Friends of the Earth Czech Republic, 2022), 28, https://hnutiduha.cz/sites/default/files/publikace/2023/01/soc_bydleni_finalni_jedna_strana_opr.pdf

[39] Hnutí DUHA, 'Energetická Chudoba a Její Řešení [Energy Poverty and Its Solution]'.

[40] European Commission, 'Assessment of the Draft Updated National Energy and Climate Plan of Czechia'.

[41] Friends of the Earth Czechia calculated that "[t]he cost of one insulated rental apartment with 3 people living in it is approximately 3-5 times [less] than the cost of one insulated family house". Hnutí DUHA, 'Energetická Chudoba a Její Řešení [Energy Poverty and Its Solution]', 66.

[42] Mariničová et al., 'Tackling Energy Poverty in EU Member States'.

contracts', sometimes only three months long. It is very easy for a landlord to evict a tenant, so the tenant has no interest in investing in the flat. As the rental market is tight, owners do not have to worry about finding tenants even if costs are high because of the low level of energy efficiency. Friends of the Earth Czechia made several proposals to address this problem:[43]

- Minimum energy performance requirements for apartment buildings used for rental housing should be introduced gradually to prevent landlords from stopping renting their apartments altogether.
- Introduce cost-sharing models between owners and tenants.
- Make public support for insulation conditional on temporary rent fixing and the minimum duration of the tenancy contract at least three years to prevent gentrification and evictions.

In Czechia, the massive privatisation of housing stock in the 1990s led to an increase in homeownership as the dominant form of tenure. The rental sector accounted for 22% of the housing stock in 2018. Social housing is also very limited. Landlords require several months' rent as a deposit, and municipalities, as flat owners, require proof of a person being debt-free or regularly servicing existing debts. The resulting situation of a 'debt trap' leads a large number of people to live in substandard lodgings. Among them are many Roma for whom economic deprivation is combined with racial discrimination in the housing market. The rents in these localities are calculated "on the assumption that the lodger receives the state social support for housing (the so-called supplement for housing), [which] is often set well above the level of the supplement for housing and social benefits combined. The contracts usually contain harsh clauses [enabling] evictions in [the] case of difficulties in paying rent. In 2015, 70,000 households lived in such lodgings, and an additional 110,000 were at risk of losing their housing".[44]

In 2016, the social welfare law was amended in a way that "allowed municipalities to identify areas with a higher concentration of 'socially unacceptable phenomena'" and designate them "non-benefit zones" within which "anyone living in such areas would be denied access to the supplement for housing". Another issue in 2019 was an attempt to design stricter rules for the allocation of housing supplements and to exclude beneficiaries from welfare provisions.[45] This affected predominantly segregated or socially excluded areas, but some municipalities declared their whole territories 'non-benefit zones' to avoid poor people moving in. In the meantime, the modifications of the law on 'non-benefit zones' have been repealed following a decision by the Constitutional Court, which concluded that "there has been the discriminatory treatment of persons" and a "de facto emptying of the right to assistance in material need necessary to ensure basic living conditions".[46]

The 'non-benefit-zone' policy was especially problematic in relation to energy poverty. A survey on living conditions conducted by Friends of the Earth and University Ostrava found

[43] Hnutí DUHA, 'Energetická Chudoba a Její Řešení [Energy Poverty and Its Solution]'.

[44] Koďousková and Lehotský.

[45] Koďousková and Lehotský, 183f.

[46] Roma Civil Monitor, 'Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Czechia' (Brussels: European Commission DG Justice and Consumers, 2022), https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C1-Czechia-FINAL-PUBLISHED-CATALOGUE.pdf

that the housing allowance has good potential to reduce energy poverty: "[O]f all households in fuel poverty, 84% (compared to 20% in the population as a whole) are eligible for housing benefit, which has significant potential to end or at least mitigate the effects of fuel poverty".[47] However, the problem here is non-use: the survey found that a very large number of households do not access this support even though they would be entitled: "7 out of 10 households in energy poverty that are entitled to more than CZK 1,000 (approximately 40 EUR) per month do not receive housing benefit".[48] This is especially the case with rental housing, where the landlord's cooperation is required and in socially excluded localities, where a large number of households is undergoing foreclosure proceedings. To increase the uptake of existing programmes (such as the boiler subsidy and, most importantly, the housing allowance), Friends of the Earth advocates for the expansion of the pre-existing network of housing contact points. Labour offices and social services frequently lack the capacity to provide related counsel. There were plans to change the Housing Support Act in a way that would "make mandatory [the establishment of] a housing focal point in all 205 municipalities with extended powers (and ensure adequate funding)".[49] Unlike targeted fuel subsidies, the housing allowance is available to all energy-poor households, regardless of their main fuel source.

An especially concerning development in this context is the recent reform proposal for social benefits that would make benefits conditional on not having any savings or valuable property, such as a car. Social Housing Platform Czechia wrote an open letter to the Ministry of Internal Affairs and Communications (15.11.2023), warning that the changes are being made without a proper analysis of the structure and reasons for poverty in Czechia, especially concerning that the housing allowance has been found to be the most important tool for alleviating energy poverty. The most problematic change from the perspective of energy poverty is the savings check.

> *For households in energy poverty, the largest proportion of households eligible for housing benefit, savings testing creates perverse incentives. The public incentive should [...] create incentives to increase the savings necessary to implement measures to reduce energy expenditure, not the other way around. We also consider the property tests problematic, ... [as] they can discourage households from submitting applications or exclude them from this support altogether.* [50]

The exclusion of certain strata of the population from the formal rental market has arguably worsened with the introduction of 'non-benefit zones'. These housing structures are associated with particular population groups in a way that can amount to environmental racism, when it serves to legitimise the exclusion of households identified as Roma[51] from

[47] Hnutí DUHA, 'Energetická Chudoba a Její Řešení [Energy Poverty and Its Solution]', 9.

[48] Hnutí DUHA, 10.

[49] Hnutí DUHA, 12.

[50] Social Housing Platform, 'Redesign Systému Nepojistných Sociálních Dávek – Možná Úskalí a Nezamýšlená Rizika. Otevřený Dopis Platformy pro Sociální Bydlení k Verzi Návrhu MPSV z 15. Listopadu 2023 [Redesigning the System of Uninsured Social Benefits - Possible Pitfalls and Unintended Risks. Open Letter of the Platform for Social Housing on the Version of the Proposal of the Ministry of Internal Affairs and Communications of November 15, 2023]', 2023, https://socialnibydleni.org/wp-content/uploads/2023/12/Otevreny-dopis_davky_11.-12.-2023_PSB-2-1.pdf

[51] Discrimination can happen on the grounds of perceived ethnic identity.

energy efficiency programmes.[52] Though abolished now, the non-benefit zones indicate the degree of territorial stigmatisation, and whether the affected localities become beneficiaries of energy efficiency programmes after this attempt to exclude them should be monitored.

Finally, Jan Husák from Romodrom observed that energy-efficiency upgrading programmes need to be redesigned in a way that creates trust among vulnerable customers that the measures will pay off in the end. The programmes should make space for involving households in the upgrading process rather than alienating them through complicated forms, unclear requirements, and time-consuming administration. Husák pointed out that Roma households often do not understand the benefits of improving the energy efficiency of their homes, hindering them from taking advantage of state support. Upgrading programmes, therefore, need to be embedded in targeted education that spreads information about how and why energy efficiency upgrading matters and the benefits associated with renewable and energy efficiency technologies such as photovoltaic panels or heat pumps. This would help broaden our current understanding of the energy transition in terms of technology and make sure that we do not overlook the people who need to learn and adopt these new technologies.

Case study: The Ústí nad Labem City Initiative for Energy Savings

Ústí nad Labem is one of the cities in Czechia with the largest number of socially excluded localities[53]. EEOS has been taken up by the municipality Ústí nad Labem. However, the programme does not adhere to the principle of specific targeting for energy-poor households required by the EED recast. It targets vulnerable consumers in that it helps renovate public buildings, including facilities where care is provided to the elderly or people with disabilities.[54] The city of Ústí nad Labem's initiative to achieve greater energy savings[55] was created in response to the growing need to use energy more efficiently and reduce the city's ecological footprint. The programme primarily focuses on buildings and spaces owned by the city. The main objective pursued so far is increasing the energy efficiency of these buildings and thus reducing the energy consumption of city-owned buildings. This approach is a logical first step as the city has direct control and management of its properties, which makes it easier to implement and monitor the effectiveness of related measures. However, as observed by Jan Husák, this does not lead to an emphasis on specific objectives related to reducing energy poverty in socially excluded localities. This lack may be due to several factors. First, focusing on city-owned buildings is a more efficient way to achieve visible results quickly. The energy performance of these buildings is often high, and their retrofitting leads to immediate and measurable savings. Comparatively, the issue of energy poverty in socially excluded localities is more complex and involves wider social and economic aspects. The tenure structure in these areas is often fragmented or unclear, complicating efforts to intervene to reduce energy poverty. In addition, socially excluded localities in Ústí nad Labem face several other

[52] One of my interlocutors maintained that including Roma households in energy-efficiency upgrading would be difficult as they live only briefly in any given place and engage in "pre-capitalist, feudal" ways of renting houses. This is an example of how a structural problem (chains of contracts, shortages of housing) becomes attributed to an assumed ingrained tendency for frequent moving and 'backward' economic practices in the Roma community and thus racialised.

[53] Toušek et al., 'Sociálně vyloučené lokality z pohledu sociodemografických ukazatelů'.

[54] 'Energy-Efficient Projects in the Ústí Region', Fedarene (blog), accessed 1 April 2024, https://fedarene.org/best-practice/energy-efficient-projects-in-the-usti-region/

[55] This text was compiled on the basis of a working version of the document: National Centre for Energy Savings z.s. (NCEÚ). Initiative of the city of Ústí nad Labem to achieve higher energy savings. Evropská 11, 160 00 Prague 6, Czech Republic.

challenges that require an emphasis on data collection – a crucial part of increasing the energy performance of buildings.

In the case of Ústí nad Labem, the intention is to focus the programme on buildings where most energy savings can be realised. However, the question is whether socially excluded localities, where many buildings would fulfil this criterion, will be audited. Husák points to the possibility of asking for the co-financing of energy audits by the city. However, without a dedicated component in the programme and assistance by the city or civil society groups (as in the case of Slovakia, Lunik IX) who are aware of the significance of energy audits and the financial factors associated with obtaining them, this will be challenging.

National Strategy of Equality, Inclusion and Participation of Roma in the Czech Republic

The Czech NRSF[56] reflects, to some extent, the problem of energy poverty and exclusion from formal housing. Under the section "Socially Excluded Localities", the analytical part of the NRSF tackles the specific case of container housing, which has very poor energy efficiency. The action plan of the NRSF[57] contains the goal of "support[ing] the increase of energy efficiency and installation of alternative sources of energy in socially excluded locations". Specifically, it proposes "to minimize the number of households living without access to energy (absence of infrastructure, disconnection from supplies), as well as households that cannot afford to heat their apartment sufficiently (low temperature in winter) and households that cannot secure the socially and materially necessary level of energy services". It also mentions the relation between energy bills, debt and social exclusion: "Due to the fact that energy arrears are among the key events on the way to social exclusion, the measure will be aimed at timely problem detection and prevention of household over-indebtedness".

While these are important points, the NRSF misses the opportunity to articulate concrete synergies between social and energy policy, i.e., how to address gaps in current energy efficiency schemes, to identify how areas that, until recently, have been hit by the policy of 'non-benefit zones' can now be integrated into social energy schemes, and what the necessary steps are for alleviating difficulties in accessing regular rental or social housing that is one of the causes of enduring energy poverty. The proposed measures are very simplistic energy transition policies with little to no consideration of how they intersect with specific social problems. They are thus likely to run into the difficulties that Friends of the Earth Czechia has already observed in regard to 'mainstream' social energy programmes. Specifically, the action plan proposes to install alternative energy sources like "community photovoltaic power plants that would help reduce operating electricity costs while providing renewable energy for the local community". Further, the action plan maintains that "building and technical modifications can be carried out by the owners of flats and houses". These measures do not consider the problems arising from collective ownership/investment (due to the inequality of means among owners within an apartment building, some parties might

[56] Government of the Czech Republic, 'Strategie Rovnosti, Začlenění a Participace Romů (Strategie Romské Integrace) 2021–2030 [Strategy of Equality, Inclusion and Participation of Roma in the Czech Republic 2021 - 2030]', 2021, 62, https://vlada.gov.cz/assets/ppov/zalezitosti-romske-komunity/aktuality/Strategie-rovnosti--zacleneni-a-participace-Romu-2021---2030---textova-cast_OK_2.pdf

[57] Government of the Czech Republic, 'Příloha č. 1: Úkolová Část Strategie Romské Rovnosti, Začlenění a Participace/ Strategie Romské Integrace 2021 – 2030 [Appendix No. 1: Task Part of the Roma Equality, Inclusion and Participation Strategy/ Romani Integration Strategy 2021-2030]', 2021, 29, https://vlada.gov.cz/assets/ppov/zalezitosti-romske-komunity/aktuality/05-Strategie-romske-rovnosti--zacleneni-a-participace-2021---2030---ukolova-cast_2.pdf

not be able to invest) and the structure of the rental market (short-term rental contracts) that disincentivise landlord-tenant cooperation associated with energy efficiency. It also misses the opportunity to analyse pre-existing eco-social policies and make concrete proposals concerning how they could be made more inclusive for low-income Roma households (such as, for example, the 'boiler subsidy' programme directed at energy-poor households or the 'Green Savings Light' programme). Overall, the section instead seems to contain commonplace energy policies and no concrete steps towards integration with social policy. This may be a symptom of what many observers have described as policymaking in silos – where different departments put little thinking into dealing with cross-cutting topics and synergies.

Conclusion

The dominant measure to alleviate energy poverty, as is the case in most CEE countries, is utility price cuts that do not benefit the majority of households in energy poverty. Price cuts target only gas and electricity, which are used by only 40% of households in energy poverty, leaving unaddressed those who use district heating as well as solid fuel users. While the new draft of the NECP mentions that energy poverty is greatest among tenants, the energy efficiency upgrading programs do not reflect these findings.

Housing allowance and social benefits have great potential to alleviate energy poverty in Czechia, especially among Roma households in socially excluded localities, but they are currently underused. This may be an aftereffect of the recently abolished non-benefit zones. A recent proposal to reform social benefits in Czechia would make benefits conditional on not having any savings or valuable property, further alienating low-income households from the opportunity to invest in energy-efficiency upgrades.

The case study of Ústí nad Labem shows how energy savings are being realised in the portions of the building stock that are most accessible to renovation for the municipality rather than the worst-performing housing stock, particularly in socially excluded localities.

The NRSF proposes general measures to alleviate energy poverty in socially excluded localities that do not take into consideration any of the challenges discussed in our analysis above.

3.2. Hungary

Legal definition of energy poverty

The Hungarian welfare state has been repeatedly described as anti-poor in its orientation.[58] It is therefore not surprising that the Hungarian draft updated NECP has a two-sentence-long section on energy poverty that does not include the term 'energy poverty'. This is in line with the general orientation of the Hungarian welfare state, which tends to be geared

[58] Dorottya Szikra, 'Welfare for the Wealthy: The Social Policy of the Orbán-Regime, 2010 - 2017' (Friedrich-Ebert-Stiftung, 2018), https://library.fes.de/pdf-files/bueros/budapest/14209.pdf.

towards those who are already better off and avoid the term 'poverty' and, in this context, 'energy poverty'.[59]

The section describes 'vulnerable customers' as those with difficulties financing their energy needs and mentions that this may be related to the properties of the buildings they inhabit. It further announces that "[f]or the purpose of determining membership of [i.e., identifying] vulnerable consumers, detailed definitions with indicators are defined for each supporting policy measure".[60] This definition is provided in the Hungarian Law on Energy Efficiency (2020), where the Hungarian government uses the term 'households to be supported' instead of vulnerable customers. 'Households to be supported' "are those whose annual energy costs of heating the indoor space to 20°C and of producing hot water exceed[…] 25% of the household's annual income."[61] However, the NECP does not provide an indication of the number of households in energy poverty or a corresponding measurable target to reduce this number. It proposes the introduction of smart meters to make these households more active consumers (i.e., more aware of their spending and active in self-regulation). While smart meters have been found to prevent disconnections, they tend to create a two-tiered segmentation of energy consumers into poor and better-off and promote an understanding of energy poverty as a lack of awareness and informed decision-making, which aligns with the antipoor policy-making orientation of the Hungarian state.[62] The plan also does not specify the link between energy efficiency measures and social policy. In its evaluation of the draft updated NECP, the EC comes to the conclusion that "the description of the current situation of energy poverty is not sufficiently detailed. It does not provide synergies […,] accelerate building renovation and make energy savings in a targeted manner. Hence, no direct effect on households in energy poverty and on the empowerment of vulnerable consumers can be discerned".[63]

Available data

Energy poverty in Hungary is most prevalent among solid fuel users.[64] According to the Household Budget Survey (HBS), solid fuel use, to a large extent firewood, has increased since 2006. Firewood, both from commercial traders and self-collected by households, is the second most commonly used source of energy for indoor heating in Hungary (22%). This development can be linked to increases in gas prices based on the phenomenon of fuel source switching (households that are connected to gas but move to use solid fuels). At the

[59] Csaba Weiner and Tekla Szép, 'The Hungarian Utility Cost Reduction Programme: An Impact Assessment', Energy Strategy Reviews 40 (1 March 2022): 100817, https://doi.org/10.1016/j.esr.2022.100817.

[60] Government of Hungary, 'National Energy and Climate Plan. Revised Version 2023', 2022, https://commission.europa.eu/document/download/f51a47de-30f0-4176-bab0-89fca0244233_en?filename=HUNGARY%20-%20DRAFT%20UPDATED%20NECP%202021-2030%20_EN.pdf.

[61] Weiner and Szép, 'The Hungarian Utility Cost Reduction Programme'.

[62] Sergio Tirado-Herrero, 'Precariousness in the Access to Electricity through Prepayment Meters in Hungary (PREPAY)', *Fuel Poverty Research Network*, 2021, https://www.fuelpovertyresearch.net/wp-content/uploads/2022/12/EPEC-Project-Report-Sergio-Tirado.pdf.

[63] European Commission, 'Assessment of the Draft Updated National Energy and Climate Plan of Hungary', Commission Staff Working Document (Brussels, 18 December 2023), https://commission.europa.eu/system/files/2023-12/SWD_Assessment_draft_updated_NECP_Hungary_2023.pdf.

[64] Anna Zsofia Bajomi, Nóra Feldmár, and Sergio Tirado-Herrero, 'Will Plans to Ease Energy Poverty Go Up in Smoke? Assessing the Hungarian NECP through the Lens of Solid Fuel Users' Vulnerabilities', Sustainability 13, no. 23 (January 2021): 13047, https://doi.org/10.3390/su132313047.

same time, the price of coal and firewood increased by 1.5 between 2010 and 2018.[65] If used in individual stoves, solid fuels significantly contribute to indoor air pollution and present health risks for users. Informal or illegal firewood collection is a problematic issue associated with deprived Roma communities in rural areas, who have been subject to fines and even imprisonment for this reason.[66] According to the ERGO study on housing, Roma households in Hungary are especially affected by fuel poverty and rely primarily on firewood[67].

Measures

The measures outlined in the NECP are mainly directed at the middle classes, while low-income households and those off the grid (solid fuel users) do not benefit.[68] Measures aimed at mitigating energy poverty follow the general orientation of the Hungarian welfare state of benefitting those who are already better off.[69] This can be seen both in schemes to subsidise energy prices and house renovations.

Since 2013, Hungary has deployed a utility price cut that provides greater savings to higher-income households and exclusively benefits households connected to modern heating systems.[70] The measure is at odds with research that shows that energy poverty is much more widespread among solid fuel users.[71] Much less money is allocated to support the solid fuel consumers, and the allocation method for the subsidy is deficient, especially since it does not account for regional disparities. Western municipalities receive much more support than Eastern ones because local governments can apply and get more funds for the population aged over 80. However, "population aged over 80" is not the most useful proxy for fuel poverty, and such households may not need solid fuel subsidies because they are connected to the grid (Interview Feldmár). Due to the longer life expectancy and a greater old-age population, richer Western municipalities receive more fuel subsidies than Eastern municipalities, even though fuel poverty is more prevalent in the latter. The allocation method is thus inefficient, resonating with the lack of a definition of energy poverty and vulnerable consumers in official documents. The firewood that has been distributed by the municipalities was sometimes wet and contributed to indoor air pollution.[72] Roma households in Hungary, which are especially affected by fuel poverty and rely primarily on firewood, are especially impacted by the lack of efficient measures.

The utility price cut scheme underwent reform in 2022. Since 1 August 2023, reduced energy pricing has been applicable only to electricity consumption of up to 2,523 kWh/year and

[65] Weiner and Szép, 'The Hungarian Utility Cost Reduction Programme'.

[66] Stefan Bouzarovski et al., 'Unpacking the Spaces and Politics of Energy Poverty: Path-Dependencies, Deprivation and Fuel Switching in Post-Communist Hungary', *Local Environment* 21, no. 9 (September 2016): 1151–70, https://doi.org/10.1080/13549839.2015.1075480.

[67] Amana Ferro, 'Roma Access to Quality and Affordable Housing in Bulgaria, Czech Republic, Hungary, Romania, Slovakia, Spain' (Brussels: ERGO Network, 2023), https://ergonetwork.org/wp-content/uploads/2023/11/Ergo-2023-access-housing-WEB-V4.pdf.

[68] Anna Zsofia Bajomi, Nóra Feldmár, and Sergio Tirado-Herrero, 'Will Plans to Ease Energy Poverty Go Up in Smoke? Assessing the Hungarian NECP through the Lens of Solid Fuel Users' Vulnerabilities', *Sustainability* 13, no. 23 (January 2021): 13047, https://doi.org/10.3390/su132313047

[69] Szikra, 'Welfare for the Wealthy: The Social Policy of the Orbán-Regime, 2010 - 2017'.

[70] Weiner and Szép, 'The Hungarian Utility Cost Reduction Programme'.

[71] Bajomi, Feldmár, and Tirado-Herrero, 'Will Plans to Ease Energy Poverty Go Up in Smoke?'

[72] Bajomi, Feldmár, and Tirado-Herrero, 'Will Plans to Ease Energy Poverty Go Up in Smoke?'

natural gas consumption of up to 1,729 m3/year. Electricity consumption above this limit costs double the price, and gas as much as seven times more. Together with the increase in the price of firewood, this measure is likely to increase the number of households in energy poverty.[73] While the former are called "market prices", they are actually government-specified prices and will be the highest in Europe.[74] As there is very little support for poor households to increase their energy efficiency (see section below), this measure is likely to hit those who consume more electricity and gas because of low building efficiency. It thus seems to have a punitive character in relation to energy-poor households.

Case study: HfHH Adaptation of the Rural Family Housing Support Program

The NECP mentions the state housing fund and 'Rural Family Housing Support Program' ('village CSOK'), which are either not at all focused on energy efficiency renovation or not accessible to many low-income households for several reasons: applicants are required to prove two years of social security coverage stemming from employment. Employment in public works, which is something many Roma in rural areas in Hungary are engaged in, does not count. Moreover, applicants should not be indebted and must prove they have a certain number of square meters of housing space per inhabitant, which is a requirement that is difficult for many poor families to fulfil. Finally, the programme requires the upfront payment of renovation costs. Habitat for Humanity Hungary (HfHH) provides support for low-income rural families with three or more children, many of whom are Roma, to access the state renovation subsidy. The support is a form of social One-Stop-Shop and consists of four elements: social, administrative, financial, and technic. First, HfHH deploys a social worker to reach out and identify families that fulfil the eligibility criteria and provide support throughout the process. Second, through a partnership with Erste Bank, HfHH has managed to provide credits for the upfront payment and covers lawyers' fees for families to help them fulfil the criteria that house ownership must be shared between wife and husband. Finally, HfHH also provides technical support – planning the renovations that are possible from the fund and connecting families to local entrepreneurs who carry out the renovations (Interview with Nora Feldmár). In 2022, 12 family homes were renovated and in 2023, another 20. Typical renovations include the replacement of windows and doors, fixing roofs, bringing utilities into the home, tackling humidity, leaks and mould, and upgrading obsolete heating devices. While some houses are in such poor condition that the entire subsidy is used for structural renovation, in other cases, it is used for energy efficiency improvements. The fund has increased in the last year from 5 to 7.5 million Hungarian forints (around 19,000 EUR) per household with three or more children.[75] HfHH recently expanded its target groups to include families with two children. While the amount of funding for two children is a bit lower than for three or more, with the recent increases in the state subsidy and in relation to the effort required to find families who fulfil all the criteria and have three children, it now makes sense to also include smaller families.

[73] POWERPOOR, 'POWERPOOR - Hungary's Policy Roadmap to Alleviate Energy Poverty (Part of D5.9)' (Powerpoor. Empowering Energy Poor Citizens through Joint Energy Initiatives, 2023), https://www.powerpoor.eu/sites/default/files/2023-07/Hungary%20policy%20roadmap.pdf

[74] Krisztián Szabó, 'Record High "Market Prices" Introduced in the Hungarian Residential Electricity and Gas Markets', *Atlatszo*, 9 August 2022, https://english.atlatszo.hu/2022/08/09/record-high-market-prices-introduced-in-the-hungarian-residential-electricity-and-gas-markets/

[75] Anna Bajomi, 'Hungary: Habitat for Humanity, Hungary. Renovating the Unfit Housing Stock: Case Study #4' (FEANTSA, 2023), https://www.feantsa.org/public/user/Resources/reports/2023/Renovation_case_studies/Habitat_Hungary_Booklet.pdf

Case study: Solar Energy for "Catching up Municipalities"

In the 'Hungarian National Recovery and Resilience Plan' (NRRP), 3% of the total budget of the 'Recovery and Resilience Fund of Hungary' (6.9 billion EUR) goes to "catching-up municipalities" – 600 social housing units, and 55 solar panel energy plants for 50 households each. In autumn 2023, 21 mini-power plants were built in 20 locations. The funds generated by selling solar power will be transferred to a social fund to provide support for the heating of around 2,000 families in need. The support covers one electric heater per household and prepayment meters to cover the energy costs of the electric heating. Electric heaters are very inefficient, and one heater will only heat one room. Moreover, the programme is very small compared to the pervasiveness of energy poverty and the lack of social housing in Hungary. Another point of contestation is that the energy plants are entirely managed by the Order of Malta charity and not the local government. This poses a problem as there is a lack of transparency in the allocation of the funds to specific locations and beneficiaries. The Hungarian state has, to a large extent, outsourced responsibility for housing problems among Roma to the Order of Malta (as is visible, for example, in the Hungarian Social Inclusion Strategy (HNSIS)),[76] and the allocation of the funds to the Order of Malta indicates that the programme will benefit Roma communities with housing problems.

A second component of energy efficiency upgrades under the heading "energy (green transition)" of the NRRP targets energy-poor households. The NRRP foresees the allocation of solar panels and heat pumps to 35,000 individual households. However, the preconditions are likely to exclude those in the most precarious housing conditions (e.g., to qualify, the rooves of homes have to be in good condition, and the fund only covers minor renovation work on windows). HfHH recommends that, instead of technologies such as solar panels and heat pumps, a detailed renovation plan for the worst-performing buildings should be developed alongside low-tech solutions to increase basic energy efficiency, such as the renewal of chimneys, installation of ECO-design compliant stoves and the provision of adequate fuel.

Hungarian Social Inclusion Strategy (HNSIS)

The HNSIS 2020 – 2030 contains a section called "Spatial Inequalities, Urban Development – Housing and Energy Poverty – Environmental Awareness, Environmental Protection", which is very general and mentions the problem of segregation and the lack of public services. On the topic of fuel poverty, it recognises the problem of burning highly polluting materials (waste). The section on "Directions for Interventions" contains a recommendation for connecting segregated settlements to utilities so that Roma households living in segregated settlements have the same access to utilities. 'Utilities' refers to sewage and gas, which is a questionable intervention given the target of entirely decarbonising homes. These settlements were built during state socialism as 'lower value homes' and have very thin walls, which will make it difficult to increase energy efficiency. The suggested measure (developing additional state and/or municipal subsidies for promoting the installation of prepayment meters) is conditional on the "willingness and ability [of households] to pay" for

[76] Roma Civil Monitor, 'Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Hungary' (Brussels: European Commission DG Justice and Consumers, 2022), https://romacivilmonitoring.eu/wp-content/uploads/2023/07/RCM2-2022-C1-Hungary-FINAL-PUBLISHED-CATALOGUE.pdf

these utilities,[77] which makes the measure seem disciplinary rather than supportive and incompatible with the basic phenomenon underlying housing segregation and energy poverty: i.e. households are disconnected due to impoverishment, discrimination and social exclusion rather than a lack of 'willingness' to pay their bills.

Conclusion

The Hungarian welfare state can be described as anti-poor in its orientation. The NECP defines energy poverty without mentioning the word 'poverty', and measures are rather disciplinary than supportive. This is particularly visible in the Hungarian Social Inclusion Strategy discussed at the end of the chapter. Energy poverty is greatest among solid fuel users who do not benefit from the utility price cut that was introduced in 2013. Roma households are especially affected by energy poverty and rely primarily on firewood as a fuel source.

Energy efficiency renovation programs are largely inaccessible to low-income households. However, the case study of the 'Rural Family Housing Support Programme' shows how HfHH has successfully supported low-income rural families with three or more children, many of whom are Roma, to access the state renovation subsidy via a social One-Stop-Shop model and credits provided by Erste Bank. The second case study discusses the allocation of a portion of the Hungarian Recovery and Resilience Fund to install solar energy sources in catching up municipalities. While there is good evidence that the Programme will benefit Roma households, it is small in scope (providing heating for one room only and having a limited number of beneficiaries compared to the size of the problem). Moreover, high-tech solutions, while corresponding to the technology orientation of the RRF, are not suitable for dealing with the worst-performing housing stock, which lacks basic preconditions for taking advantage of technologies such as heat pumps.

3.3. Ireland

Legal definition of energy poverty

Ireland adopted a separate national strategy on energy poverty in 2011. Following the 'National Strategy to Combat Energy Poverty' (2016 – 2019), Ireland adopted in 2022 the 'National Energy Poverty Action Plan'.[78] Ireland implemented a cross-departmental and inter-agency Energy Poverty Steering Group to develop, implement, and oversee policies and measures aimed at alleviating energy poverty as a follow-up of its 'Energy Poverty Action Plan' launched in December 2022. Ireland is also funding a research programme by the Economic and Social Research Institute Ireland (ESRI) to develop new methods of quantifying and understanding energy poverty in Ireland, thus ensuring that better-targeted measures may be implemented (draft updated NECP 2023).

The definition of energy poverty is very basic: the proportion of households whose monthly expenditure on energy is greater than 10%. This definition does not adequately capture those

[77] Hungarian Government, 'Magyar Nemzeti Társadalmi Felzárkózási Stratégia 2030 [Hungarian National Social Inclusion Strategy 2030]', 2020, 129, https://szocialisportal.hu/wp-content/uploads/2023/03/MNTFS2030.pdf

[78] Government of Ireland, 'Energy Poverty Action Plan', 2022, https://www.gov.ie/en/publication/159cb-energy-poverty-action-plan/

households that save on energy costs by not heating or cooling their homes to a comfortable level (so-called 'hidden energy poverty'). A coalition of environmental CSOs and those representing Traveller and Roma communities in Ireland are advocating for self-reported measures to be included in the official definition of energy poverty, including the ability to keep the house adequately warm, arrears paying energy bills and the affordability of improving the insulation of a house and switching to renewable energy sources.[79]

Available data

Energy poverty among Travellers is much more pronounced than the Irish national average. According to an analysis by the National Traveller Money Advice and Budgeting Service (National Traveller MABS) of 2019, 75% of the Irish Traveller community live in energy poverty, which is measured in relation to household expenditure[80]. Broken up according to housing type, 84% of the Traveller community that live in group housing schemes are affected. The majority are Travellers living in trailers on 'non-authorised' halting sites where weekly fuel costs were as much as 158 EUR per week in 2019.[81]

This is due to a combination of interconnected reasons. First is the problem of a lack of authorised halting sites: the wait to be granted a halting site can be from 10 to 20 years, as observed by different Traveller organisations.[82]

> *A significant proportion of the Community (around 13%) continues to view life in a permanent halting site as 'the ideal place to live', although this practice has been in decline in recent decades for various reasons, not least the availability of space within which to reside, and a societal/policy failure to develop adequate halting site provision since the inception of the Traveller Accommodation Act, 1998.*[83]

The halting sites that do exist are not located safely and are not properly equipped and maintained:

> *At least 4000 Travellers are living in substandard, poorly serviced, and maintained sites. Some of these sites don't have electricity or water. The sites are often remote, not easily accessible by public transport, and often flood-prone.*[84]

[79] Community Law and Mediation Ireland, 'Community Organisations Issue Joint Call and Recommendations for a New Energy Poverty Strategy', 2022, https://communitylawandmediation.ie/change/community-organisations-issue-joint-call-and-recommendations-for-a-new-energy-poverty-strategy/

[80] Energy poverty is currently quantified in Ireland using the "expenditure method", that is, a household that spends more than 10% of their income on energy is considered to be in energy poverty (National Traveller MABS, 'Accommodating Ethnicity. Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers. An Exploratory Study' (National Traveller Money Advice & Budgeting Service, 2019), https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf.)

[81] National Traveller MABS, 'Accommodating Ethnicity. Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers. An Exploratory Study' (National Traveller Money Advice & Budgeting Service, 2019), https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf

[82] ENAR, 'The Climate Crisis Is a (Neo)Colonial Capitalist Crisis: Experiences, Responses and Steps towards Decolonising Climate Action' (European Network Against Racism ENAR, 2022), 39, https://www.enar-eu.org/wp-content/uploads/2022_report-climatechangeandrace_final.pdf

[83] National Traveller MABS, 'Accommodating Ethnicity. Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers. An Exploratory Study', 7.

[84] ENAR, 'The Climate Crisis Is a (Neo)Colonial Capitalist Crisis: Experiences, Responses and Steps towards Decolonising Climate Action', 38.

As a consequence of this under-servicing of halting sites, "Travellers have been forced to buy diesel generators in order to access electricity, which are expensive and cause a lot of pollution".[85]

Second, there is the problem of financial exclusion – Travellers are frequently excluded from electronic forms of payment that allow them to switch providers or even access credit. For example, on authorised halting sites, "electricity [costs are] paid directly to local authorities, and households currently have no autonomy to choose or switch providers".[86]

A study by Traveller MABS on energy poverty inquired with the Sustainable Energy Authority of Ireland (SEAI) about the possibility of initiating energy audits (Building Energy Rating, BER), which resulted in a negative response:

> *[A] BER is unlikely to apply to mobile homes or trailers as (i) the associated rating assessment is conducted using certain assumptions based on building methods /conventions; (ii) that in the case of mobile homes, there are no such assumptions, and (iii) that even the lowest assumption would still overestimate the BER for mobile homes.* [87]

As a first step in overcoming this exclusion, Traveller organisations have advocated for introducing national guidelines (similar to the BER system) to support the selection of energy-efficient trailers for Travellers. However, this has not yet been agreed upon or introduced. Caravan Loan Schemes allow Travellers to purchase newer trailers that are more energy efficient (email conversation with Pavee Point, October 2023). Moreover, Pavee Point has suggested introducing a 'trailer loan' scheme that includes rental options as well as 'rent-to-buy' options.[88]

Measures

Ireland has already ring-fenced energy efficiency savings. Of the countries studied in this report, Ireland has already incorporated provisions for energy-poor households into their EEOS and is currently redesigning its EEOS to move away from a single-measure approach to a more comprehensive one. For the next implementation phase (2020-2030), it plans to establish that interventions must increase the home's energy efficiency to a high standard of B2 BER. However, Ray Breen from ESG Leadership Development & Engagement Lead, Electric Ireland (ESB), remarked that tackling energy poverty through EEOS in Ireland put the emphasis on the amount of energy savings rather than the number of households lifted out of energy poverty and thus encourages investments to be spent on council housing, as large areas can be easily renovated with large energy savings.[89]

---

[85] ENAR, 38.

[86] Friends of the Earth Ireland, 'An Examination of Blockages to Retrofitting and Heat-Pump Installation in Ireland. Research Report', 2022, 17, https://www.friendsoftheearth.ie/assets/files/pdf/blockages_to_retrofitting_and_heat-pump_installation_in_ireland.pdf

[87] National Traveller MABS, 'Accommodating Ethnicity. Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers. An Exploratory Study', 9.

[88] Pavee Point, 'Energy Poverty Action Plan Consultation. Submission to Department of the Environment, Climate, and Communications' (Dublin: Pavee Point Traveller and Roma Centre, September 2022), https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Response-to-Energy-Poverty-Strategy-Consultation-1.pdf

[89] SocialWatt, 'Connecting Obligated Parties to Adopt Innovative Schemes Towards Energy Poverty Alleviation. D 4.6 Policy Factshets', 2023, https://socialwatt.eu/sites/default/files/socialwatt_tools/D4.6%20Policy%20fact%20sheets_final.pdf.

In Ireland, official documents are largely silent about the specific problems faced by Traveller communities living in different types of housing (private rental, local authority or on halting sites) associated with energy poverty. While the government of Ireland has invested 109 million EUR to support lower-income households to improve the energy efficiency of their homes, Travellers have rarely benefited from these schemes.[90] Key documents regarding energy efficiency upgrading for housing, such as the 'National Retrofit Plan' and grants by the Sustainable Energy Authority Ireland (SEAI), do not currently include provisions for energy efficiency measures for traveller accommodation. Pavee Point recommended that the 'SEAI Warmer Homes' scheme, funded by the Government of Ireland and the European Regional Development Fund (ERDF), which currently only targets homeowners, be expanded to include recipients of housing assistance payments (HAP), as many Travellers living as tenants in group housing schemes have relied on the latter payment.

In Ireland, a number of community and environmental organisations have come together around a common set of recommendations for a new energy poverty strategy. Among them are Pavee Point, National Traveller MABS, Friends of the Earth Ireland, and Fridays for Future, to name but a few. The recommendations are (1) an all-government approach to energy poverty instead of silo-ism, (2) better data collection, (3) monitoring and evaluation, (4) participation, (5) a rights-based approach, and (6) measures aligned with climate justice.[91] These common demands employ a rights-based approach – clarifying the responsibility of the government towards marginalised groups and involving equality bodies in the energy poverty strategy – and a multi-dimensional approach, as energy poverty stems from various interconnected circumstances that need to be addressed and dealing with only one (such as energy costs) is unlikely to resolve the problem.

Case study: Electricity Costs Emergency Scheme

The 'Energy Poverty Action Plan' (2022) refers to Travellers in two places. First, with regard to the 'Electricity Costs Emergency Benefit Scheme', which was intended to credit 550.47 EUR to each domestic electricity account. The scheme uses the single Meter Point Registration Number (MPRN) identifier to ensure it can be administered automatically and without an application/approval process. Since the implementation of the first Scheme, it came to the attention of DECC (Departments of the Environment, Climate & Communications) that Traveller families who use local authority accommodation where there is a single MPRN registered to the local authority did not receive this payment. DECC has worked with local authorities to ensure that the payments under the first and second schemes are made available to this group. Second, the Action Plan refers to the caravan loan scheme.

An important novelty of the draft updated NECP is the proposal to use large parts of the carbon tax on energy efficiency renovation for social housing and low-income households.

[90] ENAR, 'The Climate Crisis Is a (Neo)Colonial Capitalist Crisis: Experiences, Responses and Steps towards Decolonising Climate Action', 39.

[91] Community Law and Mediation Ireland, 'Community Organisations Issue Joint Call and Recommendations for a New Energy Poverty Strategy'.

National Traveller and Roma Integration Strategy (2017 – 2021)

The 'National Traveller and Roma Integration Strategy' (NTRIS 2017 – 2021) did not mention energy/ fuel poverty.[92]

Conclusion

Ireland has an expenditure-based definition of energy poverty, which does not make visible energy poverty that takes the form of households saving on energy costs by not adequately heating or cooling their homes. Unless based on self-reported data, this is also difficult to assess for households, such as for many Travellers living on halting sites, who rely on off-the-grid and non-modern forms of heating. Travellers are frequently affected by financial exclusion, which limits their ability to switch providers or access credit. Building energy rating systems do not currently cover trailers. However, the Caravan Loan Scheme enables Travellers to buy new trailers which will be more energy efficient.

While Ireland did ringfence energy savings, the emphasis has been put on the amount of energy savings rather than the number of households lifted out of energy poverty. This encourages investments in large council housing units or similar structures that can be easily renovated rather than targeting households more specifically.

In Ireland, official documents are largely silent about the specific problems Traveller communities face regarding different housing types (private rental, local authority or halting sites). An exception to this is the 'Energy Poverty Action Plan' (2022), which introduced the 'Electricity Costs Emergency Scheme' for Traveller households that have their meter registered with the local authority.

The Irish National Traveller and Roma Integration Strategy does not mention energy or fuel poverty.

3.4. Slovakia

Legal definition of energy poverty

Alongside Ireland, France and the UK, Slovakia is one of the few countries where energy poverty is officially defined.[93] The definition is expenditure-based[94] and thus is not in line with the EED recast.

In Slovakia, the Regulatory Office for Network Industries (RONI) oversees and regulates energy prices and has been tasked with elaborating a more detailed definition of energy poverty. In 2019, it came up with the following: "[I]ndividuals or households [that] do not

[92] Department of Children, Equality, Disability, Integration and Youth Ireland, 'National Traveller and Roma Inclusion Strategy 2017 - 2021', 2017.

[93] Hedvika Koďousková and Dominik Bořuta, 'Energy Poverty in Slovakia: Officially Defined, but Misrepresented in Major Policies', *Energy Policy* 168 (1 September 2022): 113095, https://doi.org/10.1016/j.enpol.2022.113095.

[94] Law No. 250/2012 Coll. of Laws defines energy poverty as "a situation where the average monthly expenditure of a household on the consumption of electricity, gas, heat for heating and the preparation of domestic hot water forms a significant share in the average monthly income of the household". RONI, 'Koncepcia Na Ochranu Odberateľov Sp´l˘najúcich Podmienky Energetickej Chudoby.' (Regulatory Office for Network Industries, 2019), https://www.urso.gov.sk/data/att/d03/317.e303b2.pdf

have sufficient financial means to secure heating and other forms of energy needed for the functioning of the household, which in the Slovak Republic [account for…] 10% of the average household expenditure on energy from the total net money income of the household, *and at the same time* this household meets the conditions for being awarded [some form of] assistance [due to] material need" (RONI 2019, 17, current author's emphasis). This definition excludes populations affected by energy poverty who do not qualify or have been excluded from social benefits.[95] An example is the housing allowance, which is not accessible to households living in dwellings without a building permit. This situation is especially acute for marginalised Roma communities (MRC), of whom 85% live under the poverty line but only 36% receive housing allowance.[96] Also, the housing allowance can be revoked if a tenant is late in servicing housing-related debt.[97] Among MRC, two-thirds of households have difficulty covering their housing-related expenses compared to less than a third of the general population.[98] The problem is all the more acute due to recent energy-price increases and in the knowledge of the finding based on EU SILC data that for up to 36% of households in Slovakia, unexpected expenditure poses the risk of a debt trap.[99]

In 2020, the attempt to define energy poverty and insert this into social policy ceased with the general elections.[100] Since then, RONI has put together an inter-ministerial working group to develop a future energy poverty definition and implementation framework draft by the end of 2023. Its task is to draft, among other strategies, an implementation roadmap. Besides the Energy Regulator, the working group comprises representatives of the Ministry of Finance, Ministry of Labour and Social Affairs, Ministry of Economy, Ministry of the Environment, Ministry of Investments and Regional Development, Ministry of Education and the Slovak Academy of Science. The working group is mentioned as a best practice example in the EC's summary evaluation of the draft updated NECPs.[101] The working group developed a definition and recommendations for solving the issue of energy poverty, both of which were submitted to the government in September 2023. At the time of writing this report (March 2024), the government had still not responded. Details of the consultations could not be obtained since the participants had to sign a non-disclosure agreement (Interview Dokupilova). There have been several utility price cuts in Slovakia, but these may be considered populist measures that do not substantially address energy poverty.

The EC assessment of the draft updated NECP concludes that targeted measures for addressing energy-poor households and vulnerable customers are currently mainly ad hoc

[95] Koďousková and Bořuta, 'Energy Poverty in Slovakia', 5.

[96] Roma Civil Monitor, 'Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Slovakia' (Brussels: European Commission DG Justice and Consumers, 2022), https://romacivilmonitoring.eu/wp-content/uploads/2023/07/RCM2-2022-C1-Slovakia-FINAL-PUBLISHED-CATALOGUE.pdf.

[97] Koďousková and Bořuta, 'Energy Poverty in Slovakia', 6.

[98] Roma Civil Monitor, 'Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Slovakia'.

[99] Richard Filčák and Dušana Dokupilová, 'The Concept of Energy Poverty in Slovakia', *Prognostické Práce - Foresight, Analysis, and Recommendations / PP - FAR* 11, no. 1 (2019): 21.

[100] Dušana Dokupilová and Richard Filčák, 'Regional Disparities as Roots of Energy Poverty in Slovakia', in *Perspectives on Energy Poverty in Post-Communist Europe*, ed. George Jiglau et al. (Oxon, New York: Routledge, 2021), 206–21.

[101] Council of the European Union, 'Assessment of the Draft Updated National Energy and Climate Plans'.

and that structural policies aimed at increasing energy efficiency have yet to be evaluated by the inter-ministerial working group.[102]

Available data

According to the European Domestic Energy Poverty Index (EDEPI), Slovakia (next to Hungary and Bulgaria) is one of the three EU countries considered to have extreme levels of energy poverty among low-income households.[103] As it is more difficult for lower-income households to save energy, the recent energy price increase led to a 6% cost increase for the average-income household but close to 9% for a low-income one. Among the low-income households, 23% of household spending went on energy bills (1,000 EUR per year).[104]

Official data in Slovakia do not accurately represent the actual level of energy poverty. In particular, the measurement of energy poverty as an effect of being off-grid needs to be adequately represented. This is the most common cause of energy poverty among marginalised Roma communities in Slovakia.[105] The pervasiveness of energy poverty among MRC in Slovakia can be reconstructed based on the dedicated EU SILC data collected in Slovakia in 2018 in MRC and from the general EU SILC survey:[106]

- 25% of MRC households cannot afford to maintain a reasonable temperature in their homes – whether sufficiently warm in winter or sufficiently cool in summer.
- 16.8% of MRC households were repeatedly in arrears with services – electricity, gas, and water.
- 34% of MRC households are dwellings unsuitable for healthy living – they show signs of damp.
- 12.7% of MRC households had poor-quality electrical installations, while 7% were unconnected to the mainstream electricity supply.
- 83% of households rely on a stove as the main heating source. This is despite the fact that most of the latter live in brick houses. Similarly, stoves or ovens are also a common source of hot water. More than 50% of households in MRC use this option. Only 33% of households use an electric heater to heat their hot water.

Furthermore, the *Atlas of Roma Communities* shows a gap between being connected to the electricity supply (97%) and actual electricity usage (83%), which can be attributed to an

[102] European Commission, 'Assessment of the Draft Updated National Energy and Climate Plan of Slovakia', Commission Staff Working Document (Brussels, 18 December 2023), https://commission.europa.eu/system/files/2023-12/SWD_Assessment_draft_updated_NECP_Slovakia_2023.pdf.

[103] The EDEPI is a composite indicator on domestic energy poverty that computes for low-income households four common metrics used to assess the causes and symptoms of energy poverty into a single figure. Low-income households refers here to the first income quintile households Right to Energy Coalition, 'Power to the People: Upholding the Right to Clean, Affordable Energy for All in the EU', 2019, https://friendsoftheearth.eu/wp-content/uploads/2019/02/media_briefing_-_power_to_the_people_-_right_to_energy_coalition.pdf..

[104] Right to Energy Coalition, 'Power to the People: Upholding the Right to Clean, Affordable Energy for All in the EU', 2019, https://friendsoftheearth.eu/wp-content/uploads/2019/02/media_briefing_-_power_to_the_people_-_right_to_energy_coalition.pdf

[105] Dusana Dokupilova, 'Affordability of Energy for Specific Groups of People (Roma Community) in Slovakia', in *Energy Poverty (EP)-Pedia* (ENGAGER COST network, 2021), https://www.eppedia.eu/article/affordability-energy-specific-groups-people-roma-community-slovakia

[106] Dokupilova.

inability to pay electricity bills and the fact that electricity is being cut off. However, some of these data sources used as proxies for energy poverty among the Roma are misleading. For example, the 2019 *Atlas of Roma Communities* reports that 97% of the local population has access to electricity and 70% to gas.[107] In contrast, field data collected by the CSO 'Roma Environmental Sustainability Development Initiative' (RESDI) shows that the actual numbers are significantly lower.[108] Based on these different sources of data and proxies, RESDI (Interview 25.10.2023) estimates that the actual proportion of energy poverty among Roma communities in Slovakia is 50% compared to 5-19% of the general Slovak population.

Measures

Government programmes that support a reduction in energy expenses are hindered by poor allocation methods. This is not only the case with the general gas and electricity price cuts but also in relation to housing renovation programmes. From the perspective of savings and the green transition, those houses that are currently least efficient should be targeted first to create the greatest savings. From the perspective of energy poverty, households with the lowest income-to-housing-quality ratio should be targeted first. However, most of the housing renovation measures do the opposite.

The Slovak Innovation and Energy Agency's 'Green for Households' subsidy scheme covered 50% of renovation costs, including for renewable energy, and used state-guaranteed loans. However, this scheme was not accessible to low-income households or municipalities that own and manage social housing stock because they did not have the financial means to access the loans.[109]

Under the 'Recovery and Resilience Plan,' Slovakia allocated 528.8 million EUR for family house renovation. In 2022, the Slovak Environmental Agency started a programme to support 30,000 low-income households in implementing energy renovations by subsidising 75% of the cost. The original proposal included people with disabilities and single-parent households in the circle of those eligible.[110] However, the way it was adopted in the end was in line with the populist allocation method: the main beneficiaries were families with more than four children and families with at least one child with disabilities (Interview Melichár 28.11.2023). The allocation method is not based on any research concerning who the groups most affected by energy poverty actually are. Money was allocated to 3,600 households. However, only 119 of them were actually low-income. The main reason for this low uptake is that the funds can only be accessed retrospectively, and low-income households have no means of making high upfront payments (Interview Dokupilova 5.12.2023). The programme targets areas with high air pollution, as Slovakia is currently paying fines to the EU for overstepping the limits on air pollution (Interview Melichar 28.11.2023). Another program is 'Renovate Housing', which uses part of the State Housing Development Fund (SHDF) to provide loans at a preferential rate (0.5 to 2% for 20 years to cover 75-100% of costs) for

[107] Dokupilova.

[108] Eva Mariničová et al., 'Tackling Energy Poverty in EU Member States', 2023, https://bankwatch.org/publication/tackling-energy-poverty-in-eu-member-states

[109] Mariničová et al.

[110] S.O.S., 'Prvý štátny program na obnovu domov pre chudobných možno už konečne aj na Slovensku [The first state program for the restoration of houses for the poor may finally be in Slovakia]', *Spoločnosť ochrany spotrebiteľov (Consumer Protection Society - S.O.S.)* (blog), 12 April 2022, https://www.sospotrebitelov.sk/aktuality/prvy-program-na-obnovu-domov-pre-chudobnych-uz-aj-na-slovensku/

the "insulation of apartment building", "replacement of common gas, electricity, sewage, water, air conditioning and heat distribution in an apartment building", as well as "other modernization" measures. Applicants can be owners or, as is the case in Lunik IX (described below), the municipality.[111] However, the investment could lead to an increase in rent, which the inhabitants would not be able to afford.

A new Slovakian programme funded under REPower called 'Renovate Housing Light' for 1,600 low-income households is forthcoming. Those who are eligible can apply for 100% of their renovation costs, and access will be simplified as 35 field consultants will cooperate with social workers and municipalities to help overcome administrative hurdles. The programme was inspired by the 'Renovate Housing Light' programme that was implemented in Czechia.[112]

Finally, in 2021, a new governmental decree implementing the Act on Energy Efficiency of Buildings was issued. The new regulation introduced more demanding requirements for the energy efficiency of new buildings, making them much more expensive than before. Discussions with the Ministry of Transport, Construction and Regional Development explored the possibility of exempting small houses built by inhabitants of informal housing in Roma settlements from the regulation; unfortunately, the recent decision of the ministry is that the regulation also applies to such buildings.

In the following, we will present the findings of (pro-) Roma CSOs that shed light on the inaccessibility of energy efficiency renovation programmes from the perspective of the inhabitants of two locations with apartment buildings predominantly inhabited by Roma families. One location considered applying to the former (the case of Lunik IX), and the other actually did apply (the case of Veľký Krtíš).

Case study: Energy Audit in Lunik IX

In Košice, RESDI conducted an energy audit for Lunik IX and a feasibility study, concluding that neither the 'Renovate Housing' nor 'Green for Households' subsidy scheme would enable the necessary and recommended energy efficiency renovations.[113] According to estimates from 2022 by the Slovak Statistical Office, Lunik IX has approximately 7,129 inhabitants.[114] While the neighbourhood was mixed during the socialist era, the transition led to increasing social inequalities and uneven investment, and it became a segregated area inhabited almost

[111] Jakub Csabay and Viktor Teru, 'Analýza Návrhu Pilotných Riešení Energetickej Chudoby Rómskych Komunít v MČ Luník IX. Na Základe Energetického Auditu Bytového Domu Hrebendova 1-3' (Priatelia Zeme CEPA, 2022), https://drive.google.com/file/d/1IaTz_ak-hh21BiBzglYG8FCPsE2LTjJB/view.

[112] Mariničová et al., 'Tackling Energy Poverty in EU Member States'; Government of the Slovak Republic, 'Obnova Budov v REPower EU | Plán Obnovy', April 2023, https://www.planobnovy.sk/repowereu/obnova-budov/

[113] Jakub Csabay and Viktor Teru, 'Analýza Návrhu Pilotných Riešení Energetickej Chudoby Rómskych Komunít v MČ Luník IX. Na Základe Energetického Auditu Bytového Domu Hrebendova 1-3' (Priatelia Zeme CEPA, 2022), https://drive.google.com/file/d/1IaTz_ak-hh21BiBzglYG8FCPsE2LTjJB/view

[114] City Population, 'Luník IX Borough in Košice', in *City Population. Population Statistics for Countries, Administrative Divisions, Cities, Urban Areas and Agglomerations - Interactive Maps and Charts*, 2022, https://www.citypopulation.de/en/slovakia/kosice/599972__lun%C3%ADk_ix/

exclusively by marginalised Romani households. The feasibility study was conducted for one apartment building (13 households).[115]

Based on the assessment, the auditors suggested three different scenarios for energy efficiency upgrading:[116]

1. "basic functional measures", having as its main goal ensuring the basic energy needs of the residents, such as plastering non-functional openings in walls and providing portable heating devices, plus measures to increase the energy efficiency of buildings, such as the replacement of old ventilators with more economical ones, the installation of doors at the entrance to buildings, and the installation of LED bulbs. The cost of this was estimated at 32,957.30 EUR. The savings would be 24.02 MWh/ year, and the payback time 0.57 years.
2. "cost-optimal measures" would consist of replacing broken windows with double-glazed wooden windows decommissioned from other such apartment buildings and basic insulation using 100 mm of mineral wool. The roof is not sufficiently insulated for a heat pump to be used efficiently, so the auditors suggested the installation of gas boilers. The cost would be 687,201.98 EUR, the savings 140 MWh/ year and the payback time (due to the poor initial-cost-to-energy savings ratio) 37.80 years.
3. "ecologically optimal measures" would consist of insulation with 150mm of mineral wool, photovoltaic panels on the roof and heat pumps. In this scenario, the cost would be 1,006,337.58 EUR, with savings of 351.34 MWh/ year and a payback time of 13.65 years.

The auditors recommended adopting either the first or the third solution. The second was not recommended as it would "lock in" a fossil fuel-based solution that would be disadvantageous due to the expected increase in the price of fossil fuel and "could make it impossible to switch to the ecologically optimal option". Also it would generate only minimal energy savings, making it inefficient in relation to the upfront investment (as demonstrated by the long payback time of 37 years).[117] Slovakia currently supports the installation of gas boilers, that is, the second solution, in areas affected by air pollution, but Friends of the Earth has criticised this measure as short-term, perceiving it first as unsustainable and, in the long run, also more expensive.[118]

For the third solution, the authors analysed the 'Renovate Housing' and the 'Green for Households' subsidy programme. The primary concern with the 'Renovate Housing' program is that it could lead to an increase in rent. Further, the 'Green for Households' scheme by the Slovak Innovation and Energy Agency covers only solar collectors and biomass boilers, which

[115] Jakub Csabay and Viktor Teru, 'Marginalised Roma Communities in the Context of the Green Transition: Energy Poverty at Lunik IX. and the Case for New Methodologies and Interdisciplinary Approaches' (Racism, Justice, Environment: Critical Approaches in Romani Studies and Beyond, Vienna: Central European University, 2023).

[116] Csabay and Teru, 'Analýza Návrhu Pilotných Riešení Energetickej Chudoby Rómskych Komunít v MČ Luník IX. Na Základe Energetického Auditu Bytového Domu Hrebendova 1-3'.

[117] Csabay and Teru.

[118] Juraj Melichar, 'Assessment of Slovakia's Draft Recovery and Resilience Plan' (CEE Bankwatch Network, 2021), https://bankwatch.org/wp-content/uploads/2021/04/2021-04-23_Slovakia-RRF-assessment_final.pdf

are not among the measures recommended for Lunik IX. Moreover, 50% of the expenses would need to be covered by the municipality or residents.[119]

Additionally, the CSO RESDI considered leveraging the 'EU Modernisation Fund' that supports measures to increase energy efficiency in 10 lower-income EU MS and is expected to amount to 4 billion EUR for Slovakia. However, in Slovakia, the only eligible applicants are business entities, so Lunik IX would need a social enterprise to apply in its name. The authors proposed that Slovakia adopt similar regulations to Czechia, where municipalities and energy communities can apply to the Modernisation Fund.[120] Another critique is that the Modernisation Fund is managed by the EIB, which, in its green spending, does not adhere to the EGD principle of "do no harm" and frequently supports fossil fuel solutions.[121]

RESDI proposes, thus, to implement the first solution with funding from the Office of the Plenipotentiary of the Government of the Slovak Republic for Roma communities. In this context, it is important to highlight that in the Slovak NRSF, to date, energy poverty is mentioned as an indicator in the section on improving housing conditions.[122] It uses the official definition ("energy costs as a significant share of household income"), which is inadequate to capture the most prevalent form of energy poverty among Roma households without a formal income.

Case Study: Community Pre-Paid Meters in Lunik IX

The limited uptake of measures for alleviating energy poverty, even in the case of measures that have been developed and tested on the ground in national policy documents, can be seen in the example of pre-paid energy schemes. This project was developed in cooperation between the local government and the Slovak energy company and was modelled on the prepaid electricity and water system in the UK. The idea is to increase access to electricity and reduce the number of households permanently cut off from the grid due to debt. The scheme has two components: one is individual households, and the other is a community scheme. Energy can be purchased at the mayor's office. Community means that the municipality is the client, and individual means that the households are the clients. The community scheme has been used for a few Roma settlements in Slovakia (most notably, Lunik IX in Košice); the individual scheme is starting to be used as a measure to decrease the number of individual households having their energy cut off. This interim measure is applied by the energy company, similar to cutting off supplies only during the day or creating schemes for debt repayment. The infrastructure for supporting community pre-paid electricity costs 20,000 EUR for a municipality. Even though this is only a fraction of the actual installation cost (the energy company covers the rest), this is still a lot for small

[119] Csabay and Teru, 'Analýza Návrhu Pilotných Riešení Energetickej Chudoby Rómskych Komunít v MČ Luník IX. Na Základe Energetického Auditu Bytového Domu Hrebendova 1-3'.

[120] Csabay and Teru.

[121] Krzysztof Mrozek, 'Modernisation Fund to Boost Fossil Fuels in Poland', *Bankwatch* (blog), 2022, https://bankwatch.org/blog/modernisation-fund-to-boost-fossil-fuels-in-poland; Anna Roggenbuck, '"EU Climate Bank" Keeps Back Door Open for Fossil Fuel Giants', *Bankwatch* (blog), 2023, https://bankwatch.org/blog/eu-climate-bank-keeps-back-door-open-for-fossil-fuel-giants.

[122] Ministry of the Interior of the Republic of Slovakia, 'Strategy of Equality, Inclusion and Participation of Roma until 2030', 2021, 51, https://www.romovia.vlada.gov.sk/site/assets/files/1526/strategy_of_equality_inclusion_and_participation_of_roma_until_2030.pdf?csrt=7651336764912120442.

municipalities. However, for a municipality like Kosice, which has a budget of about 700,000 EUR, this is quite affordable.

The new NECP includes pre-paid electricity as a measure for combatting energy poverty. This is a general measure that is not associated with targets or funding and does not distinguish between individual and community solutions. In this way, target groups and solutions found in single localities have not been translated into national policy documents. Another problem is that the system's owner is the national energy company, which has all the knowledge (Interview RESDI).

Case Study: Energy Efficiency Renovation in Veľký Krtíš

Our second example of the inaccessibility of energy efficiency renovation programmes from the perspective of apartment buildings that are dominantly inhabited by Roma families is Veľký Krtíš. In Veľký Krtíš, Roma families live in flats in a panel block building on a residential estate built in the 1950s, like in other towns where Roma have been concentrated in one place. Thanks to the Community Center for Minorities' systematic work, Roma tenants of municipal dwellings have managed to reduce and even completely settle their debts related to housing. This opened a path to a negotiation with the local government aimed at selling the municipal apartments to the Roma tenants (this type of privatisation of municipal dwellings has been the main pathway to the ownership of housing in Slovakia since the end of the communist regime, and a strong factor in the formation of the middle-class), facilitated by the CSO. This process was successful, and Roma in Veľký Krtíš became owners of their housing. Nowadays, apartment buildings are managed by the CSO with the involvement of Roma owners.

The Roma owners of the privatised dwellings in Veľký Krtíš wanted to benefit from the opportunity to reduce the energy burden and decided to apply to the 'Green for Households II' call (financed by ERDF) that aims at supporting the procurement of renewable energy source equipment. The inhabitants wanted to install solar collectors with this support. The only condition is that the dwelling house applying for this subsidy must be insulated. The owners of the flats wanted to apply for a loan to be able to fulfil the condition, allowing them to insulate their block of flats, but the loan was not granted because of the stipulation that no apartment in the block of flats could be undergoing foreclosure proceedings. Unfortunately, no block complied with this condition because there is at least one family in each block facing foreclosure because of debts due to their vulnerability as Roma. Therefore, none of the apartment blocks will be insulated, and consequently, they will not be able to apply for subsidies to improve their energy self-sufficiency or reduce their energy costs. Thus, the conditions for support (both for insulation and energy self-sufficiency) do not consider the conditions of Roma, who face discrimination, exclusion and structural disadvantages; moreover, such conditions exclude households from support because of the financial or social problems of other households living in the same blocks of apartments. Additional reasons why the programme was not accessible to the inhabitants of this apartment block included that they did not have an energy audit, they did not have a separate association of apartment owners, and there was no money for co-financing (Email exchange, Zuzana Havirova, Roma Advocacy and Research Center).

National Strategy of Equality, Inclusion and Participation of Roma until 2030

The Slovak Strategy of Equality, Inclusion and Participation of Roma until 2030 and the Action Plan do not include any measures regarding energy poverty.

Conclusion

Slovakia deploys an expenditure-based definition of energy poverty and thus is not in line with the EED recast. The definition is currently being revised by the Regulatory Office for Network Industries. In a 2019 draft, households were defined as being in energy poverty when they met the condition of being awarded social assistance. This definition is problematic as there is a large share of non-use of social assistance, especially among marginalised Roma communities (MRC), and the fact that eligibility for housing allowance is revoked in the case of delays in servicing housing-related debt.

The EU SILC dedicated to MRC in Slovakia, collected in 2018, reveals a high incidence of energy poverty in this group. Furthermore, the *Atlas of Roma Communities* shows a 14% gap between the number of households connected to the electricity supply and actual electricity usage.

Several government housing renovation programs are dedicated to low-income households, such as the Slovak Innovation and Energy Agency's 'Green for Households' and the 'Renovate Housing' programme. The two case studies show that both programs were either not useful in meeting the specific needs of a segregated Roma settlement (Lunik IX) or were inaccessible due to household debt and the lack of building insulation in a regular apartment building that was largely inhabited by Roma households.

4. Conclusion

This report provides an analysis of Roma inclusion and equity in relation to the green transition using the example of energy poverty in four countries. It thereby contributes to evaluating the effectiveness of the "leaving no one behind" principle of the EGD. While we did not sample the countries with the highest incidence of energy poverty in the European Union,[123] the report still offers important insight into the factors that make households particularly vulnerable to energy poverty, specifying which factors have not yet been systematically recognised in just transition policy making.

Whereas policy-making efforts to address energy poverty at the EU level started as early as 2009 with the Electricity and Gas Directive and even before that in some of the MS (such as Ireland), only in 2016, with the adoption of the Governance Regulation, were MS called upon to assess the number of households in energy poverty. With the adoption of the EGD, the instruments for addressing energy poverty have multiplied, most notably with EED recast Article 8, which requires MS to assess the number of people in energy poverty and ringfence a commensurate percentage of national energy savings for these households. The adoption of these new provisions by MS will be seen in the next round of updated NECPs, due in June 2024. However, in the draft NECPs, it was visible that the lack of assessment and proper targeting of energy-poor households at the level of MS is still hindering these policies from actually making a difference for households in energy poverty. With the EED recast, minority ethnic background was added to the list of factors making a household particularly vulnerable to energy poverty. However, upon reviewing the draft updated National Energy and Climate Plans (NECPs), the EC mentioned only gender and did not assess the inclusion of the minority ethnic factor, thereby missing a crucial opportunity to monitor the adoption of this principle by the Member States.

The countries analysed for this report vary in terms of legal and policy frameworks regarding ethnic minorities and the living situation of Roma. Also, to some extent, the country case studies focus on different aspects of energy poverty, depending on what the interview partners and contributing CSOs deemed most important. Despite these limitations, some significant common trends and problems regarding energy poverty can still be highlighted.

All of the countries rely on an expenditure-based definition of energy poverty, which has multiple deficiencies, among which is that those without formal access to electricity, which is common among Roma living in informal dwellings (CEE) or Travellers living in caravans, remain invisible. Data on these populations are available through different sources, such as the special EU SILC among marginalised Roma communities in Slovakia and in Ireland on Roma and Travellers. They show that Roma and Travellers are among the groups that are affected to an above-average extent by energy poverty. For other groups, such as tenants in Czechia, energy poverty is also well-proven. However, these data are not used to design policies or monitor the impact of measures. Instead, we see overly narrow definitions (such

[123] According to the EU-SILC survey, the countries with the largest proportion of respondents reporting an inability to keep their homes adequately warm are Bulgaria, Cyprus, Greece, Lithuania, Portugal, and Spain. The countries covered in this report are below the EU average for this indicator.

as in Czechia, where "vulnerable customer" refers to a person with a specified disability) and populist allocation measures (such as the 'utility price cuts' in CEE countries).

Measures for addressing vulnerable customers and households in energy poverty can be differentiated into cost-support (treating the symptoms) and structural measures (treating the causes of energy poverty). Energy poverty, especially regarding the current decarbonisation of the housing stock, can only be addressed by appropriately designing and timing income support and structural measures. However, the potential leverage that could be gained by addressing these interacting factors is lacking in all of the MS analysed for this report, with a clear preference for short-term income-support measures.

Measures addressing vulnerable customers are designed to be implemented via utility companies or network energy providers and thus do not protect firewood and coal users, among which are a large share of Roma households. The CEE countries treated in this report still strongly rely on 'utility price cuts', which involve generalist, untargeted measures that do not benefit those who suffer most from energy poverty (solid fuel users in Hungary and households with district heating in Czechia). Additionally, this focus on income-support measures does not allow low-income households to switch to renewables. Furthermore, it disincentivises energy efficiency renovations and will create problems with the forthcoming decarbonisation of the housing stock, which involves introducing a carbon price on emissions in the building sector. The structural measures aimed at reducing energy poverty are targeted in populist ways in Slovakia, Czechia, and Hungary (towards pensioners and/or middle-class families) but do not include those who are most heavily affected (for example, tenants in Czechia, or Roma living in rural areas in Hungary who are unemployed or engaged in public work schemes). The rare instances of measures that target energy-poor households have tended to fail to clear well-known and documented social policy hurdles (for example, the low uptake of housing benefits in Czechia, even though the latter could be an efficient instrument for alleviating energy poverty). Finally, renovation measures are frequently tied to energy audits that tend to apply to only certain forms of housing, excluding those with the lowest energy efficiency. Projects by RESDI in Slovakia, HfHH in Hungary, and Pavee Point in Ireland show that a greater diversity of housing types can be meaningfully included in energy audits and, thus, renovation measures.

In most countries, the allocation of state funding for energy efficiency measures, even for low-income households, is tied to financial criteria that are impossible to fulfil for low-income households: the need to make upfront payments to access subsidies or be debt-free are examples of the latter that are impossible to overcome without external support. An example of such support is the HfHH programme, which has mobilised a revolving fund to make upfront payments. In the case of Veľký Krtíš, indebtedness among the inhabitants was one of the main reasons why renovations were impossible. Such financial criteria weigh especially heavily on Irish Travellers who frequently suffer from financial exclusion and thus cannot access support schemes tied to electronic forms of payment.

In the countries analysed for this report, the most significant spending goes on programmes that are affordable to only better-off households, such as the 'Green for Households' programme in Slovakia and Czechia and the state housing subsidy in Hungary. Ireland allocated a significant amount of funding for low-income households, but this scheme does not cover caravans and thus excludes many Travellers. This leads to the renovation of higher-quality houses inhabited by segments of the population that can afford the investment. The

operation of the funding mechanism, therefore, contradicts the goals of the just transition: those houses that are currently least efficient and whose renovation would lead to the greatest savings should be targeted first. Moreover, from the perspective of energy poverty, those households that have the smallest ratio of income to housing quality should be targeted first. If transposed effectively, the recently revised Energy Performance of Buildings Directive (EPBD 2024/0129) can make a substantial difference in this context, as it adds policies and requirements for the renovation of the worst-performing buildings, which are often occupied by people in energy poverty.[124]

Another problem associated with the allocation of funding for renovations concerns EEOS, which is designed to incentivise dealing with a large number of buildings rather than a large number of households in energy poverty. This can be seen in the case of Ústí nad Labem in Czechia and in Ireland, where the focus was put on public buildings catering to vulnerable customers rather than households in energy poverty. The EED recast explicitly mentions households in energy poverty, but the effect of this new provision might be limited as energy companies are made responsible for the implementation; in practice, we have seen that to reach households in energy poverty, there is a need for multiple forms of additional support apart from funding (such as field social workers). This type of support is part of the revised EPBD (2024/0129) but not mandatory.

The NRSFs mention the problem of energy poverty in most cases, but the articulation of policy recommendations is usually generic and not tailored to the specific situation of energy poverty among Roma in the respective country. For example, in the Czech NRSF, there is no mention of the housing allowance or the position of tenants, although these are relevant to the situation of energy poverty among Roma. The Slovak NRSF defines energy poverty in income-based terms that do not represent those without a formal income.

The fair transition is currently hindered by an imbalance: decarbonisation goals are largely binding and tied to clear indicators, whereas policies ensuring the "fairness" of the transition are mostly non-binding and lack the indicators required to monitor progress.[125] The findings of this report highlight the consequences of this imbalance. Particularly, from the demonstrated deficits of income-based definitions of energy poverty and the problems in targeting renovation programs, we conclude that income-based forms of targeting are insufficient. In many cases, targeting could be improved by employing a territorial approach, focusing efficiency and renewable energy initiatives on worst-performing neighbourhoods, for instance. Our report thus supports the conclusions of the European Scientific Advisory Board on Climate Change (ESABCC), which notes that linking vulnerability to energy poverty to disposable income alone is insufficient: "Social inequalities in the context of climate change mitigation are also linked to, among other factors, spatial location (e.g. rural/urban), gender, ethnicity, age and disability".[126] A territorial approach to energy poverty would help mobilise additional funding by expanding the notion of "territories" in the JTM from "carbon-

[124] Sibileau and Vladyka, 'The EPBD Decrypted'.

[125] Sabato and Vanhille, 'The European Green Deal and the "Leave No One Behind" Principle. State of the Art, Gaps and Ways Forward'.

[126] European Scientific Advisory Board on Climate Change (ESABCC), 'Towards EU Climate Neutrality: Progress, Policy Gaps and Opportunities' (Luxembourg: Publications Office of the European Union, 2024), 234.

intensive industries" to the poorest-performing neighbourhoods.[127] This approach would effectively utilise binding criteria to enhance energy savings, minimising existing incentives and loopholes that currently allow the bypassing of segregated neighbourhoods in pursuit of these savings. Moreover, it would help to reduce pre-existing problems with the Social Climate Fund, which is meant to protect vulnerable customers and households in energy poverty from the adverse effects of the decarbonisation of the housing stock. The SCF has been found to be insufficient as a buffer, and without significant changes in the policies regarding energy poverty, it is unlikely to reach its target population.[128]

[127] McCauley and Pettigrew, 'Can Europe Lead a Just Transition? Strengthening Social Justice in the European Green Deal by Using European Pillar of Social Rights Indicators'.

[128] Anna Bajomi, 'EU ETS Extension Could Have Devastating Impact on Low-Income Households', www.euractiv.com, 18 April 2023, https://www.euractiv.com/section/emissions-trading-scheme/opinion/eu-ets-extension-could-have-devastating-impact-on-low-income-households/; European Scientific Advisory Board on Climate Change (ESABCC), 'Towards EU Climate Neutrality: Progress, Policy Gaps and Opportunities'; Institute for European Environmental Policies (IEEP), 'European Green Deal Barometer 2023' (Brussels, 2023), https://ieep.eu/wp-content/uploads/2023/06/IEEP-Green-Deal-Barometer-2023.pdf.

5. RECOMMENDATIONS

To the EU:

1. The assessment of the updated NECPs

    - should include a more complex consideration of the factors compounding vulnerability to energy poverty. Apart from ethnic minority background, there should be an assessment of how the measures affect or are tailored to the needs of households living in segregated, informal or other currently underrepresented forms of housing such as trailers.

    - should entail more detailed provisions concerning how MS arrive at definitions of vulnerable customers, vulnerable households, and energy poverty. These terms should be based on (suitable) data and be defined with the participation of a range of different stakeholders (including representatives of communities suffering from energy poverty, such as Roma and Travellers). This will help ensure appropriate targeting and avoid populist allocation methods. A meaningful resource in this context may be the Energy Justice Scorecard developed by the Initiative for Energy Justice.

2. If local governments, civil society and social enterprises are to continue playing a crucial role in the just transition, then it is necessary…

    - to oblige MS to make funding schemes available to a broader range of entities – for example, MS should be obliged to make renovation funding from the Modernisation Fund available not only to business entities but also to municipalities, energy communities, home-owners associations, and housing cooperatives as applicants.

    - to include binding criteria regarding the involvement of civil society, representatives of vulnerable groups and equality bodies in designing and monitoring the upcoming green transition funding mechanisms, especially the SCF.

    - to allocate a significant share of public green funding specifically to the needs of vulnerable groups.

To Member States:

1. For the updated NECPs:

    - Revise the definition of energy poverty to include those without formal income, without modern heating services and access to electricity (Roma living in informal dwellings in CEE and Travellers living in caravans in Ireland), especially by incorporating subjective and self-reported indicators, including arrears in paying energy bills and the affordability of improving the insulation of houses and switching to renewable energy sources.

    - Develop a method for defining and assessing vulnerable households and energy poverty with an expert commission. The former should represent the complexity of energy poverty from multiple perspectives, including the perspective of ethnic minorities. Based on this complex measurement, plan a balanced mix of income support and structural measures to counter energy poverty.

    - Set out clear targets and a timeline for reducing energy poverty, especially given the energy price increases expected to occur with the inclusion of the building sector in the

greenhouse gas emissions trading scheme. This will help ensure consistency and complementarity between the NECPs and the upcoming NSCPs.

2. Horizontally integrate the NRSFs with relevant policy frameworks in the area of the green transition and decarbonisation of the housing stock and design a governance programme dedicated to energy poverty that will create synergies between income-support measures and structural policies in the areas of energy efficiency, building renovation, and access to renewable energy.
3. Implement art. 23 of the EED requiring MS to design pathways to reduce the negative impacts of solid fuel heating on vulnerable groups.
4. Use the new lens on energy poverty as a vehicle to improve problems with the lack of uptake of pre-existing social policy measures, such as the housing allowance in Czechia.
5. Screen for domestic and international best practices and include them in national-level policies. Examples include:
    - income-support/consumption-support measures such as the pre-paid electricity meters in Slovakia with the municipality as a client, or from Ireland, where the Electricity Costs Emergency Benefit Scheme was made available to clients, including many Travellers living in local authority housing.
    - structural measures such as (1) the revolving fund that covers upfront payments for energy efficiency renovations used by HfHH, or (2) embedding targeted funding for energy efficiency renovations among energy-poor households into additional support structures such as field social workers (Slovakia under REPower and in Hungary by HfHH), or Housing Contact Points (as proposed by Friends of the Earth Czechia) that help households apply for funding, planning feasible renovation measures, and finding entrepreneurs to undertake the renovations.
    - Structural measures to solve the tenant-owner-paradox, such as gradually introducing energy efficiency standards for apartment buildings and making support for renovations conditional on longer-term rental contracts and caps on rent increases (Czechia).

LIST OF INTERVIEWS

1. Nóra Feldmar (Habitat for Humanity, Hungary), 19.10.2023 and 28.3.2024 via Zoom.
2. Viktor Teru and Jakub Csabay (RESDI, Slovakia), 25.10.2023 via Zoom.
3. Karel Polanecky (Friends of the Earth, Czechia), 1.11.2023 via Zoom.
4. Juraj Melichár (Friends of the Earth, Slovakia), 28.11.2023 via Zoom.
5. Dušana Dokupilova (Foresight Institute of the Slovak Academy of Science), 5.12.2023 via Zoom.

References

Anna Bajomi. 'Hungary: Habitat for Humanity, Hungary. Renovating the Unfit Housing Stock: Case Study #4'. FEANTSA, 2023. https://www.feantsa.org/public/user/Resources/reports/2023/Renovation_case_studies/Habitat_Hungary_Booklet.pdf.

Bajomi, Anna. 'EU ETS Extension Could Have Devastating Impact on Low-Income Households'. www.euractiv.com, 18 April 2023. https://www.euractiv.com/section/emissions-trading-scheme/opinion/eu-ets-extension-could-have-devastating-impact-on-low-income-households/.

Bajomi, Anna, Brook Riley, and Caroline Simpson. 'The People behind the Buildings: Why We Must Get It Right in the EPBD'. *Www.Euractiv.Com*, 12 May 2023. https://www.euractiv.com/section/buildings/opinion/the-people-behind-the-buildings-why-we-must-get-it-right-in-the-epbd/.

Bajomi, Anna Zsofia, Nóra Feldmár, and Sergio Tirado-Herrero. 'Will Plans to Ease Energy Poverty Go Up in Smoke? Assessing the Hungarian NECP through the Lens of Solid Fuel Users' Vulnerabilities'. *Sustainability* 13, no. 23 (January 2021): 13047. https://doi.org/10.3390/su132313047.

Bouzarovski, Stefan, Sergio Tirado Herrero, Saska Petrova, and Diana Ürge-Vorsatz. 'Unpacking the Spaces and Politics of Energy Poverty: Path-Dependencies, Deprivation and Fuel Switching in Post-Communist Hungary'. *Local Environment* 21, no. 9 (September 2016): 1151–70. https://doi.org/10.1080/13549839.2015.1075480.

City Population. 'Luník IX Borough in Kosice'. In *City Population. Population Statistics for Countries, Administrative Divisions, Cities, Urban Areas and Agglomerations - Interactive Maps and Charts*, 2022. https://www.citypopulation.de/en/slovakia/kosice/599972__lun%C3%ADk_ix/.

Civil Rights Defenders. 'Unnatural Disaster: Environmental Racism and Europe's Roma'. Civil Rights Defenders, 2023. https://crd.org/wp-content/uploads/2023/04/UnnaturalDisaster-report2023.pdf.

Community Law and Mediation Ireland. 'Community Organisations Issue Joint Call and Recommendations for a New Energy Poverty Strategy', 2022. https://communitylawandmediation.ie/change/community-organisations-issue-joint-call-and-recommendations-for-a-new-energy-poverty-strategy/.

Council of the European Union. 'Assessment of the Draft Updated National Energy and Climate Plans'. Brussels, 13 December 2023. https://data.consilium.europa.eu/doc/document/ST-16454-2023-INIT/en/pdf.

———. 'Council Recommendation on Ensuring a Fair Transition towards Climate Neutrality', 7 June 2022. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0627(04).

Csabay, Jakub, and Viktor Teru. 'Analýza Návrhu Pilotných Riešení Energetickej Chudoby Rómskych Komunít v MČ Luník IX. Na Základe Energetického Auditu Bytového Domu Hrebendova 1-3'. Priatelia Zeme CEPA, 2022. https://drive.google.com/file/d/1IaTz_ak-hh21BiBzglYG8FCPsE2LTjJB/view.

———. 'Marginalised Roma Communities in the Context of the Green Transition: Energy Poverty at Lunik IX. and the Case for New Methodologies and Interdisciplinary Approaches'. Vienna: Central European University, 2023.

Department of Children, Equality, Disability, Integration and Youth Ireland. 'National Traveller and Roma Inclusion Strategy 2017 - 2021', 2017.

Dokupilova, Dusana. 'Affordability of Energy for Specific Groups of People (Roma Community) in Slovakia'. In *Energy Poverty (EP)-Pedia*. ENGAGER COST network, 2021.

https://www.eppedia.eu/article/affordability-energy-specific-groups-people-roma-community-slovakia.

Dokupilová, Dušana, and Richard Filčák. 'Regional Disparities as Roots of Energy Poverty in Slovakia'. In *Perspectives on Energy Poverty in Post-Communist Europe*, edited by George Jiglau, Anca Sinea, Ute Dubois, and Philipp Biermann, 206–21. Oxon, New York: Routledge, 2021.

ENAR. 'The Climate Crisis Is a (Neo)Colonial Capitalist Crisis: Experiences, Responses and Steps towards Decolonising Climate Action'. European Network Against Racism ENAR, 2022. https://www.enar-eu.org/wp-content/uploads/2022_report-climatechangeandrace_final.pdf.

EQUINET. 'Preliminary Assessment of the EU Green Deal's Impact on Equality. Survey of Current Practices and Needs of European Equality Bodies'. Equinet, European Network of Equality Bodies, 18 September 2023. https://equineteurope.org/publications/preliminary-assessment-of-the-eu-green-deals-impact-on-equality-survey-of-current-practices-and-needs-of-european-equality-bodies/.

European Commission. 'A Union of Equality: EU Anti-Racism Action Plan 2020-2025'. Communication from the Commission. Brussels, 2020. https://commission.europa.eu/document/download/beb25da4-e6b9-459e-89f7-bcdbd3a8f0c8_en?filename=a_union_of_equality_eu_action_plan_against_racism_2020_-2025_en.pdf.

———. 'Assessment of the Draft Updated National Energy and Climate Plan of Czechia'. Commission Staff Working Document. Brussels, 18 December 2023. https://commission.europa.eu/system/files/2023-12/SWD_Assessment_draft_updated_NECP_Czechia_2023.pdf.

———. 'Assessment of the Draft Updated National Energy and Climate Plan of Hungary'. Commission Staff Working Document. Brussels, 18 December 2023. https://commission.europa.eu/system/files/2023-12/SWD_Assessment_draft_updated_NECP_Hungary_2023.pdf.

———. 'Assessment of the Draft Updated National Energy and Climate Plan of Slovakia'. Commission Staff Working Document. Brussels, 18 December 2023. https://commission.europa.eu/system/files/2023-12/SWD_Assessment_draft_updated_NECP_Slovakia_2023.pdf.

———. 'Assessment Report of the Member States' National Roma Strategic Frameworks'. Staff Working Document. SWD(2023) 3 Final. Brussels, 9 January 2023. https://eur-lex.europa.eu/resource.html?uri=cellar:ece09ce3-9006-11ed-b508-01aa75ed71a1.0001.02/DOC_1&format=PDF.

———. 'Czech Draft Updated NECP 2021 2030', 2023. https://commission.europa.eu/publications/czech-draft-updated-necp-2021-2030_en.

———. 'EU Guidance on Energy Poverty'. Commission Staff Working Document. Brussels, 20 October 2023. https://energy.ec.europa.eu/system/files/2023-10/SWD_2023_647_F1_OTHER_STAFF_WORKING_PAPER_EN_V5_P1_3016190.PDF.

———. 'EU Wide Assessment of the Draft Updated National Energy and Climate Plans'. Communication from the Commission. Brussels, 18 December 2023. https://commission.europa.eu/system/files/2023-12/EU-wide_assessment_draft_updated_National_Energy_Climate_Plans_2023.pdf.

———. 'Study on Energy Prices and Costs. Evaluating Impacts on Households and Industry: 2023 Edition', 2023. https://op.europa.eu/fr/publication-detail/-/publication/3b43f47c-e1c5-11ee-8b2b-01aa75ed71a1/.

European Scientific Advisory Board on Climate Change (ESABCC). 'Towards EU Climate Neutrality: Progress, Policy Gaps and Opportunities'. Luxembourg: Publications Office of the European Union, 2024.

FEANTSA. 'How to Avoid a Renoviction Wave. Report on the Social Impacts of the Renovation Wave', 2022. https://www.feantsa.org/public/user/Resources/reports/2022/1_How_to_avoid_a_Renoviction_wave.pdf.

Fedarene. 'Energy-Efficient Projects in the Ústí Region'. Accessed 1 April 2024. https://fedarene.org/best-practice/energy-efficient-projects-in-the-usti-region/.

Ferro, Amana. 'Roma Access to Quality and Affordable Housing in Bulgaria, Czech Republic, Hungary, Romania, Slovakia, Spain'. Brussels: ERGO Network, 2023. https://ergonetwork.org/wp-content/uploads/2023/11/Ergo-2023-access-housing-WEB-V4.pdf.

Filčák, Richard, and Dušana Dokupilová. 'The Concept of Energy Poverty in Slovakia'. *Prognostické Práce - Foresight, Analysis, and Recommendations / PP - FAR* 11, no. 1 (2019): 21–45.

Friends of the Earth Ireland. 'An Examination of Blockages to Retrofitting and Heat-Pump Installation in Ireland. Research Report', 2022. https://www.friendsoftheearth.ie/assets/files/pdf/blockages_to_retrofitting_and_heat-pump_installation_in_ireland.pdf.

Government of Hungary. 'National Energy and Climate Plan. Revised Version 2023', 2022. https://commission.europa.eu/document/download/f51a47de-30f0-4176-bab0-89fca0244233_en?filename=HUNGARY%20-%20DRAFT%20UPDATED%20NECP%202021-2030%20_EN.pdf.

Government of Ireland. 'Energy Poverty Action Plan', 2022. https://www.gov.ie/en/publication/159cb-energy-poverty-action-plan/.

Government of the Czech Republic. 'Příloha č. 1: Úkolová Část Strategie Romské Rovnosti, Začlenění a Participace/ Strategie Romské Integrace 2021 – 2030 [Appendix No. 1: Task Part of the Roma Equality, Inclusion and Participation Strategy/ Romani Integration Strategy 2021-2030]', 2021. https://vlada.gov.cz/assets/ppov/zalezitosti-romske-komunity/aktuality/05-Strategie-romske-rovnosti--zacleneni-a-participace-2021---2030---ukolova-cast_2.pdf.

———. 'Strategie Rovnosti, Začlenění a Participace Romů (Strategie Romské Integrace) 2021–2030 [Strategy of Equality, Inclusion and Participation of Roma in the Czech Republic 2021 - 2030]', 2021. https://vlada.gov.cz/assets/ppov/zalezitosti-romske-komunity/aktuality/Strategie-rovnosti--zacleneni-a-participace-Romu-2021---2030---textova-cast_OK_2.pdf.

Government of the Slovak Republic. 'Obnova Budov v REPower EU | Plán Obnovy', April 2023. https://www.planobnovy.sk/repowereu/obnova-budov/.

Heidegger, P, and K Wiese. 'Pushed to the Wastelands: Environmental Racism against Roma Communities in Central and Eastern Europe'. Brussels: European Environmental Bureau, 2020.

Hnutí DUHA. 'Energetická Chudoba a Její Řešení [Energy Poverty and Its Solution]'. Friends of the Earth Czech Republic, 2022. https://hnutiduha.cz/sites/default/files/publikace/2023/01/soc_bydleni_finalni_jedna_strana_opr.pdf.

Hungarian Government. 'Magyar Nemzeti Társadalmi Felzárkózási Stratégia 2030 [Hungarian National Social Inclusion Strategy 2030]', 2020. https://szocialisportal.hu/wp-content/uploads/2023/03/MNTFS2030.pdf.

Institute for European Environmental Policies (IEEP). 'European Green Deal Barometer 2023'. Brussels, 2023. https://ieep.eu/wp-content/uploads/2023/06/IEEP-Green-Deal-Barometer-2023.pdf.

Koďousková, Hedvika, and Dominik Bořuta. 'Energy Poverty in Slovakia: Officially Defined, but Misrepresented in Major Policies'. *Energy Policy* 168 (1 September 2022): 113095. https://doi.org/10.1016/j.enpol.2022.113095.

Koďousková, Hedvika, and Lukáš Lehotský. 'Hidden Energy Poverty: The Case of the Czech Republic'. In *Perspectives on Energy Poverty in Post-Communist Europe*, edited by George Jiglau, Anca Sinea, Ute Dubois, and Philipp Biermann, 173–94. Oxon, New York: Routledge, 2021.

Marin, Diego. 'Bearing the Brunt: Roma and Traveller Experiences of Environmental Racism in Western Europe'. European Environmental Bureau, January 2024. https://eeb.org/wp-content/uploads/2024/01/roma-report-WEB-1.pdf.

Mariničová, Eva, Eva Pastorelli, Lilija Apine, Krzysztof Mrozek, Jakub Csabay, and Juraj Melichar. 'Tackling Energy Poverty in EU Member States', 2023. https://bankwatch.org/publication/tackling-energy-poverty-in-eu-member-states.

McCauley, Darren, and Kerry Andrea Pettigrew. 'Can Europe Lead a Just Transition? Strengthening Social Justice in the European Green Deal by Using European Pillar of Social Rights Indicators'. SOLIDAR, 2022. https://www.solidar.org/publications-page/can-europe-lead-a-just-transition-thematic-pub/.

Melichar, Juraj. 'Assessment of Slovakia's Draft Recovery and Resilience Plan'. CEE Bankwatch Network, 2021. https://bankwatch.org/wp-content/uploads/2021/04/2021-04-23_Slovakia-RRF-assessment_final.pdf.

Ministry of Industry and Trade of the Czech Republic. 'Energetická Chudoba a Zranitelný Zákaník - Certifikovaná Metodika', 2021. https://www.mpo.cz/assets/cz/energetika/vyzkum-a-vyvoj-v-energetice/resene-dokoncene-projekty-a-jejich-vystupy/projekty-podporene-v-ramci-1-verejne-souteze-programu-theta/2021/7/ECH_ZZ_metodika.pdf.

Ministry of the Interior of the Republic of Slovakia. 'Strategy of Equality, Inclusion and Participation of Roma until 2030', 2021. https://www.romovia.vlada.gov.sk/site/assets/files/1526/strategy_of_equality_inclusion_and_participation_of_roma_until_2030.pdf?csrt=7651336764912120442.

Mrozek, Krzysztof. 'Modernisation Fund to Boost Fossil Fuels in Poland'. *Bankwatch* (blog), 2022. https://bankwatch.org/blog/modernisation-fund-to-boost-fossil-fuels-in-poland.

National Traveller MABS. 'Accommodating Ethnicity. Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers. An Exploratory Study'. National Traveller Money Advice & Budgeting Service, 2019. https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf.

Pavee Point. 'Energy Poverty Action Plan Consultation. Submission to Department of the Environment, Climate, and Communications'. Dublin: Pavee Point Traveller and Roma Centre, September 2022. https://www.paveepoint.ie/wp-content/uploads/2015/04/Pavee-Point-Response-to-Energy-Poverty-Strategy-Consultation-1.pdf.

POWERPOOR. 'POWERPOOR - Hungary's Policy Roadmap to Alleviate Energy Poverty (Part of D5.9)'. Powerpoor. Empowering Energy Poor Citizens through Joint Energy Initiatives, 2023. https://www.powerpoor.eu/sites/default/files/2023-07/Hungary%20policy%20roadmap.pdf.

Right to Energy Coalition. 'Power to the People: Upholding the Right to Clean, Affordable Energy for All in the EU', 2019. https://friendsoftheearth.eu/wp-content/uploads/2019/02/media_briefing_-_power_to_the_people_-_right_to_energy_coalition.pdf.

Roggenbuck, Anna. '"EU Climate Bank" Keeps Back Door Open for Fossil Fuel Giants'. *Bankwatch* (blog), 2023. https://bankwatch.org/blog/eu-climate-bank-keeps-back-door-open-for-fossil-fuel-giants.

Roma Civil Monitor. 'Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Czechia'. Brussels: European Commission DG Justice and Consumers, 2022. https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C1-Czechia-FINAL-PUBLISHED-CATALOGUE.pdf.

———. ‘Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Hungary’. Brussels: European Commission DG Justice and Consumers, 2022. https://romacivilmonitoring.eu/wp-content/uploads/2023/07/RCM2-2022-C1-Hungary-FINAL-PUBLISHED-CATALOGUE.pdf.

———. ‘Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Slovakia’. Brussels: European Commission DG Justice and Consumers, 2022. https://romacivilmonitoring.eu/wp-content/uploads/2023/07/RCM2-2022-C1-Slovakia-FINAL-PUBLISHED-CATALOGUE.pdf.

RONI. ‘Koncepcia Na Ochranu Odberateľov Sp´lˇnajúcich Podmienky Energetickej Chudoby.’ Regulatory Office for Network Industries, 2019. https://www.urso.gov.sk/data/att/d03/317.e303b2.pdf.

Sabato, Sebastiano, and Josefine Vanhille. ‘The European Green Deal and the “Leave No One Behind” Principle. State of the Art, Gaps and Ways Forward’. OSE Paper Series. European Social Observatory, 2024. https://www.ose.be/publication/european-green-deal-and-leave-no-one-behind-principle.

Sibileau, Hélène, and Volodymyr Vladyka. ‘The EPBD Decrypted: A Treasure Chest of Opportunities to Accelerate Building Decarbonisation’. BPIE - Buildings Performance Institute Europe, May 2024. https://www.bpie.eu/wp-content/uploads/2024/04/082_BRIEF_The-revised-EPBD-%E2%80%93-decrypted_08.pdf.

Social Housing Platform. ‘Redesign Systému Nepojistných Sociálních Dávek – Možná Úskalí a Nezamýšlená Rizika. Otevřený Dopis Platformy pro Sociální Bydlení k Verzi Návrhu MPSV z 15. Listopadu 2023 [Redesigning the System of Uninsured Social Benefits - Possible Pitfalls and Unintended Risks. Open Letter of the Platform for Social Housing on the Version of the Proposal of the Ministry of Internal Affairs and Communications of November 15, 2023]’, 2023. https://socialnibydleni.org/wp-content/uploads/2023/12/Otevreny-dopis_davky_11.-12.-2023_PSB-2-1.pdf.

SocialWatt. ‘Connecting Obligated Parties to Adopt Innovative Schemes Towards Energy Poverty Alleviation. D 4.6 Policy Factshets’, 2023. https://socialwatt.eu/sites/default/files/socialwatt_tools/D4.6%20Policy%20fact%20sheets_final.pdf.

———. ‘Implementing the New Energy Efficiency Directive to Alleviate Energy Poverty. Policy Brief’, 2023. https://socialwatt.eu/sites/default/files/news/EED%20Briefing_Implementing_the_new_Energy_Efficiency_Directive_to_alleviate_energy_poverty_FINAL.pdf.

S.O.S. ‘Prvý štátny program na obnovu domov pre chudobných možno už konečne aj na Slovensku [The first state program for the restoration of houses for the poor may finally be in Slovakia]’. *Spoločnosť ochrany spotrebiteľov (Consumer Protection Society - S.O.S.)* (blog), 12 April 2022. https://www.sospotrebitelov.sk/aktuality/prvy-program-na-obnovu-domov-pre-chudobnych-uz-aj-na-slovensku/.

Szabó, Krisztián. ‘Record High “Market Prices” Introduced in the Hungarian Residential Electricity and Gas Markets’. *Atlatszo*, 9 August 2022. https://english.atlatszo.hu/2022/08/09/record-high-market-prices-introduced-in-the-hungarian-residential-electricity-and-gas-markets/.

Szikra, Dorottya. ‘Welfare for the Wealthy: The Social Policy of the Orbán-Regime, 2010 - 2017’. Friedrich-Ebert-Stiftung, 2018. https://library.fes.de/pdf-files/bueros/budapest/14209.pdf.

Tirado-Herrero, Sergio. ‘Precariousness in the Access to Electricity through Prepayment Meters in Hungary (PREPAY)’. *Fuel Poverty Research Network*, 2021. https://www.fuelpovertyresearch.net/wp-content/uploads/2022/12/EPEC-Project-Report-Sergio-Tirado.pdf.

Toušek, Laco, Václav Walach, Petr Kupka, Ondřej Plachý, Kateřina Tvrdá, Ľubomír Lupták, and Alica Brendzová. ‘Sociálně vyloučené lokality z pohledu sociodemografických ukazatelů’. *Demografie* 60 (2018): 21–35.

Weiner, Csaba, and Tekla Szép. 'The Hungarian Utility Cost Reduction Programme: An Impact Assessment'. *Energy Strategy Reviews* 40 (1 March 2022): 100817. https://doi.org/10.1016/j.esr.2022.100817.

Widuto, Agnieszka. 'Energy Poverty in the EU. Briefing'. European Parliamentary Research Service, 2023. https://www.europarl.europa.eu/RegData/etudes/BRIE/2022/733583/EPRS_BRI(2022)733583_EN.pdf.

GETTING IN TOUCH WITH THE EU

In-person

All over the European Union there are hundreds of Europe Direct centres. You can find the address of the centre nearest you online (european-union.europa.eu/contact-eu/meet-us_en).

On the phone or in writing

Europe Direct is a service that answers your questions about the European Union. You can contact this service:
— by freephone: 00 800 6 7 8 9 10 11 (certain operators may charge for these calls),
— at the following standard number: +32 22999696,
— via the following form: european-union.europa.eu/contact-eu/write-us_en.

FINDING INFORMATION ABOUT THE EU

Online

Information about the European Union in all the official languages of the EU is available on the Europa website (europa.eu).

EU publications

You can view or order EU publications at op.europa.eu/en/publications. Multiple copies of free publications can be obtained by contacting Europe Direct or your local documentation centre (european-union.europa.eu/contact-eu/meet-us_en).

EU law and related documents

For access to legal information from the EU, including all EU law since 1951 in all the official language versions, go to EUR-Lex (eur-lex.europa.eu).

Open data from the EU

The portal data.europa.eu provides access to open datasets from the EU institutions, bodies and agencies. These can be downloaded and reused for free, for both commercial and non-commercial purposes. The portal also provides access to a wealth of datasets from European countries.

DS-01-24-001-EN-N

ISBN 978-92-68-20558-7 doi: 10.2838/5311806