

Fundamental and social rights in the green transition - energy efficiency and energy poverty

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1. EXECUTIVE SUMMARY

Estonia's energy strategy emphasizes market-based energy pricing and the integration of renewable energy sources. Following energy import disruptions from Russia, Estonia aims to diversify its energy sources and strengthen regional cooperation for enhanced security. The main pillars of energy and environmental policy in Estonia include a strong commitment to achieving climate neutrality by 2050, the integration of renewable energy sources, the phase-out of oil shale energy, and a strategic focus on digitalization and innovation in the energy sector. The present study focuses on the project 'Reconstruction grants 2022 - 2027', which has the goal to fund both the comprehensive renovation of apartment buildings and, as a single activity, the replacement of gas, stove, or electric heating devices in the heating systems of apartment buildings with devices that use renewable energy sources, or the connection of such apartment buildings to the district heating network. The supported activities will enable enhancement the energy efficiency of the apartment building and promote the adoption of renewable energy. The study reveals that while the energy efficiency renovation program for apartment buildings is largely successful, issues remain regarding the exclusion of certain buildings and informal housing. There are concerns regarding perceived difficulties in applying for the support, occasional technical malfunction of the system, the principle of first-come-first-served as the principle governing the application process.

The program does not specify target groups. Instead, the program aims to provide financial support for the renovation of apartment buildings without consideration of who owns or lives in the apartments. It therefore does not contain provisions aiming to prevent discrimination based on individual characteristics. The emphasis is on supporting building associations and not individuals. The decision to renovate is viewed as an internal matter for apartment associations, with no intervention from the state. The program does not consider individual vulnerability. Poverty is addressed through a separate mechanism—the social welfare system—which provides services and benefits to households. This system also assists in mitigating issues caused by high heating bills or renovation loan repayments. The renovation grants are pivotal in funding apartment buildings to enhance energy efficiency and encourage renewable energy use. This initiative has garnered positive feedback for reducing emissions and improving resident living conditions, albeit with challenges in accessibility and structural program limitations.

The concepts of “just transition” and “leave no one behind” entered Estonian policy and normative discourse towards the end of 2010s primarily in connection with the support of the Eastern part of Estonia. These concepts in practice are focusing on economic transformation in Eastern Estonia from oil-shale dependency to greener energy, supported by the Just Transition Fund. Critiques of the National Energy and Climate Plan (NECP) point to insufficient details on ensuring fair transitions, signalling a need for more inclusive transition planning.

The absence of a unified legal definition of energy poverty in Estonia, termed "energiaostuvõimetus" or inability to purchase energy, reflects gaps in policy coherence and welfare adjustments. Similarly, transport poverty remains underexplored. The Climate Act aims to address these shortcomings, focusing on long-term justice and transition strategies.

Returning to the program under review, short-term benefits include economic relief from reduced energy costs and improved housing conditions. Long-term impacts are anticipated in sustained energy savings and enhanced infrastructure. However, the program faces criticism over financial burdens from loan obligations, exclusion of single house owners, and market distortions from increased property values. To address the identified gaps, recommendations include securing stable funding, enhancing targeted support for vulnerable groups, broadening stakeholder engagement, and implementing proactive monitoring to ensure equitable and sustained program benefits.

The present report reflects publicly available information on the program and insights from semi-structural interviews with stakeholders from public and private sectors who are engaged in various functions with the program. Illustrating quotes from interviews open the 'real life' behind policies and regulations.

2. Reaching climate targets through energy efficiency

The development plan for Estonia's energy sector through 2030 outlines a vision focusing on supplying energy at market-based prices, aligned with EU long-term energy and climate policies. The plan emphasizes energy security through renewable sources, aiming for climate neutrality by 2050, and setting targets for renewable energy integration, including ending reliance on oil shale and enhancing digitalization within the sector. Following Russia's energy import cessation, Estonia seeks to diversify energy sources and bolster regional cooperation for security. Expert opinions on the renovation program for apartment house energy efficiency are overwhelmingly positive, recognizing its impact on modernizing infrastructure and reducing emissions, despite climate factors explaining some energy consumption reductions. However, criticism arises due to exclusion of certain building types and informal housing from program benefits.

The concept of "just transition" has gained traction in Estonia's policy discussions, particularly for supporting Eastern Estonia's transition from oil shale to cleaner energy. The Ministry of Finance oversees these measures, corresponding with EU regulations to mitigate socio-economic impacts. Critiques of Estonia's National Energy and Climate Plan (NECP) draft say it lacks detailed plans addressing fair transitions. The Just Transition Fund supports affected regions like Ida-Viru County, dealing with high GHG emissions from oil shale. National efforts aim at improving economic conditions through innovations in green energy and sustainable practices.

On energy poverty, Estonia lacks a unified legal definition, though "energiaostuvõimetus" (inability to purchase energy) is introduced in policy discourse, aligning broadly with EU standards but lacking concrete welfare system changes. Similarly, "transpordivaesus" (transport poverty) remains under-recognized in formal plans. Fundamental rights impact assessments are generally adhered to in legislative initiatives, urging proportional evaluations, though energy-specific assessments lack explicit mandates. The ongoing Climate Act development stresses intergenerational justice and just transition but omits detailed procedural guidelines.

2.1. Energy efficiency

[Estonia's Energy sector development plan 2030](#) (2017: 13) describes the vision of the development of Estonia's energy sector. It has the goal of ensuring energy supply for consumers with a market-based price and availability. This approach is in line with the long-term energy and climate policy goals of the European Union, while contributing to the improvement of Estonia's economic climate and environmental condition and the

growth of long-term competitiveness.¹ The plan sets the goal of ensuring market based energy security from renewable energy sources in the long run. The [NECP](#) (2023) states that *Estonia's national (environmental, climate and energy) activities are guided by the EU's environmental, climate and energy policies and the related legal framework. In the context of the preparation of the sectoral development plans, the national thematic objectives and the national measures needed to achieve them shall be defined.* (p. 175) The plan is built on the significant role of the EU in Estonia's environmental, climate and energy policies. The main pillars of energy and environmental policy in Estonia include a strong commitment to achieving climate neutrality by 2050, the integration of renewable energy sources, the phase-out of oil shale energy, and a strategic focus on digitalization and innovation in the energy sector.² The goal as outlined in [NECP](#) (2023) is to achieve climate neutrality by 2050. The country is also aiming for 100% of its annual electricity demand and 65% of energy demand to be covered by renewable sources by 2030, as Estonia is transitioning away from oil shale energy. Estonia also has the goal to leverage high level of digitalization in energy sector, and, finally, following the cessation of energy imports from Russia, Estonia will have enhanced its energy security by diversifying its energy sources and increasing regional cooperation. Energy security is based on the concept of diversification and elimination on reliance on a single outside country as the main provider of energy.

The views of experts and stakeholders consulted in the context of the present study are almost consensually positive regarding the necessity and timeliness of the energy efficiency program of apartment houses renovation. The initiation of the renovation program was motivated by the political obligations in the context of the EU climate policies and introduced to respond to the need to modernize Estonia's aging housing stock to prevent these buildings from becoming uninhabitable and to ensure they do not excessively waste energy. The perception of the 'political' motivation behind the reconstruction grants is illustrated by the following quote:

"The decision to give these supports was a political one".

Original statement: "Et pigem on see selline poliitiline otsus. Et selliselt neid toetusi jagada".

The interviewees highlight the program's success in achieving significant energy savings and reducing greenhouse gas emissions. The data on the state of Estonia's energy sector available before the programme launch indicated that Final Energy Consumption (FEC) reduction between 2021 and 2022 in Estonian residential sector is mostly climate-related rather than linked with an improvement of the housing stock.³ However, the data covering the programme implementation period are not available yet.

The interviewees also note that the program has helped to improve living conditions for residents and extend the lifespan of existing buildings. For instance, it transpires from the perceptions of the interviewees' that homeowners, especially in low-income

¹ Ministry of Finance of Estonia (2017), [Energiamajanduse arengukava aastani 2030](#) (Energy development plan until 2030, available in Estonian) https://valitsus.ee/sites/default/files/documents/2021-01/enmak_2030.pdf.

² IEA (2023), Estonia 2023. Energy Policy Review, please see the [Executive Summary](#)

³ See the recent data of Estonian's energy sector released by the Commission, State of the Energy Union 2024: [Estonia](#), page 3.

brackets, benefit from reduced energy costs and enhanced living conditions. This was a direct target of the program and is seen as a victory in promoting energy efficiency and economic relief. From the other side, the increase in the quality of living conditions and energy costs reduction is off-set by financial burden to make the loan payments. So it can be said that there is an element of subjectivity in the assessment of the program's effects.

The interviewees also appear to share the view that the renovation program has certain gaps and omissions. Some refer to buildings and some refer to people. There are structural concerns with certain categories of buildings, such as older buildings and historical properties. They face strict regulations regarding the types of modifications that can be made and are thus often excluded from the program due to these complexities, leaving a significant portion of the owners of housing stock without support for energy efficiency improvements. Regarding people, for instance individuals in non-traditional housing such as mobile homes or informal settlements are largely excluded.⁴ However, and despite such criticism of the program's limitations, the interviewees' general perception of the program remains optimistic.

2.2. Just transition

The concepts of “just transition” and “leave no one behind” entered Estonian policy and normative discourse towards the end of 2010s⁵ primarily in connection with the support of the Eastern part of Estonia.

In Estonia, the Just Transition policies are the responsibility of the Ministry of Finance, which has established a dedicated [website](#). The Ministry of Finance is also responsible for drafting the national response – which includes measures to implement the EU legislation and policies - to the EU regulation 2023/955 on establishing a [Social Climate Fund](#) that covers the No one left behind theme; the draft document is expected by mid-2025.⁶

The Just Transition section in the [Estonia's NECP](#) has two foci:

- Supporting the county of Ida-Viru and permanent residents of the region. The reason is that Estonia's oil shale mining areas are situated in Ida-Virumaa County. In 2018, 7303 people were employed in oil shale sector and the oil shale energy will remain as the largest industry in Ida-Viru county for the next decade.
- The Estonian economy also requires investments in the transition to cleaner energy and more sustainable jobs, and also in the transition to wind farms (incl. acquisition of air surveillance radars for national defence purposes), electrical energy storage solutions, cogeneration stations, biofuels and electricity in

⁴ While there are newer grant possibilities in the future for owners of private houses, these segments are not addressed now, see <https://kredex.ee/en/majaduueks>.

⁵ Sepper, M; Michelson, A., (2000), *Ida-Virumaa õiglase ülemineku võimaluste analüüs*. Tallinn. Poliitikauuringute Keskus Praxis. (*Analysis of the possibilities of Eastern Virumaa just transition*) The analysis is available only in the [Estonian language](#)

⁶ Author's e-mail correspondence with the Ministry of Climate representative, 01.04.2023.

transport, the development of electric railways and modern rental housing stock, the reconstruction of apartment buildings, the demolition of abandoned sites, the reduction of the carbon intensity of the cement and lime industry and the recycling of the tail gases generated by industry.

Out of the 195 pages of the NECP, approximately 0.5 pages are devoted to the topics of Just transition and no one left behind.

The [European Commission has communicated](#) that Estonia's NECP for 2019 inadequately addresses the challenges of a fair transition. The draft updated NECP for 2023 also received similar [feedback from the EC](#) that it falls short in sufficiently addressing the challenge of a fair and just transition. However, the Just Transition plans not meeting the standards set by the EC seems to be Europe-wide problem in draft updated NECPs, not characteristic to Estonia only: *“The effects of the transition policies and measures on income distribution, job creation, transformation and destruction, and energy poverty are seldom discussed in the draft plans. Overall, these do not include adequate quantitative analysis nor take into account sufficiently the distributional impacts on the different population groups. Moreover, none of the plans include sufficient information for the preparation of the future Social Climate Plans and on how the consistency between the two plans would be ensured.”*⁷

The Ministry of Finance has established a dedicated website [Õiglase Ülemineku Fond](#) / Just Transition Fund. It is in Estonian only. The microsite features links to East-Viru county development plans and to the [“Eesti nutika spetsialiseerumise strateegia”](#) / “National Smart Specialisation Plan”.

The [Estonian Coalition agreement 2023 – 2027](#) of the political parties which make up the current government, addresses the topic of just transition regarding Ida-Viru County under Chapter “Regional policy and rural life”. It makes a promise specifically to expedite the use of funding from the Just Transition Fund, where necessary redesigning measures to ensure that they better meet the needs of the region in question. The government will enhance its capacity for Russian-language communication in order to outline the opportunities offered by the fund.

2.3. Energy poverty

There is neither a unified national legal definition of energy poverty nor a unified national legal definition of transport poverty in Estonia. However, the notion of energy poverty has made its way into national legislation and official policy documents. It is evident that Estonian policymakers have been actively engaged in adapting and

⁷ COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS EU wide assessment of the draft updated National Energy and Climate Plans An important step towards the more ambitious 2030 energy and climate objectives under the European Green Deal and RePowerEU. COM/2023/796 final. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A796%3AFIN>.

adopting the notion to fit Estonian realities, primarily at the level of discourse. Moreover, after the transposition of the Directive 1791/2023 in energy efficiency, the notion of energy poverty will become part of Estonia's 'official' normative discourse. There is also available data from Eurostat 2024 regarding Estonia, showing that 24,2% of the population with income below 60% of median equivalised income (related to general at-risk-of-poverty threshold) is at risk of poverty, as opposed to the EU average of 16,2%.⁸ The "inability to keep home adequately warm" indicator for Estonia – the indicator for the general population - shows some increase, from 2,0% to 4.1% for a general population, and an almost 5 percentage points increase for households at risk of poverty - from 3,2% in 2021 to 8,1% in 2023.⁹ Officials working in various governmental institutions in the social services sector have refrained from commenting whether energy poverty exists, stating that the topic has not been addressed nor studied. From the other side, some academic research projects use the terminology of energy poverty frequently and highlight the need to study the phenomenon more extensively¹⁰. The notion of transport poverty has not yet received any substantive attention.

The notion of energy poverty

Examination of relevant national documents reveals that the EU initiative to institute the notion of energy poverty has resemblance to Estonian welfare provision and public administration system. The updated [NECP2030](#), introduces a novel word "energiaostuvõimetus" (literal translation of which is "the situation of inability to buy or pay for energy") and maps it to its English counterpart "energy poverty". In concrete, the [Update](#) provides at page 58: "Estonia's current national development documents do not consider energy poverty as an issue of its own". The notion of being in energy poverty was introduced into Estonian welfare system by equating it to being unable to cope with daily expenses. This situation has been relieved by offering subsistence benefit to the households, and to certain individuals living in those households, who have been identified as receiving monthly income below the subsistence line.

⁸ State of the Energy Union 2024: Estonia. Available at: [a2f762b0-efdd-42f6-8451-dd2a9f550e8c_en](#) or [Statistics | Eurostat](#).

⁹ Data as of 12 December 2024. See Eurostat respective findings for countries at: https://ec.europa.eu/eurostat/databrowser/view/ILC_MDES01_custom_3027707/default/table?lang=en. The risk of poverty threshold as 60% of median equivalised income.

¹⁰ Gérard, F., Glicker, J., Aeby, L., Cheikh, N., Lee, L.Y., Volkova, A., Kurnitski, J., Tamm, M., Süld, R. (2023), *Support to the renovation wave—energy efficiency pathways and energy saving obligation in Estonia*. Deliverable 3: Comprehensive study of energy efficiency pathways for Estonia. Final. Available at: <https://energiatalgud.ee/sites/default/files/2024-02/Estonia%20RenoWave%20-%20D3%20report%20-%20FINAL.pdf>, pp. 22-26.

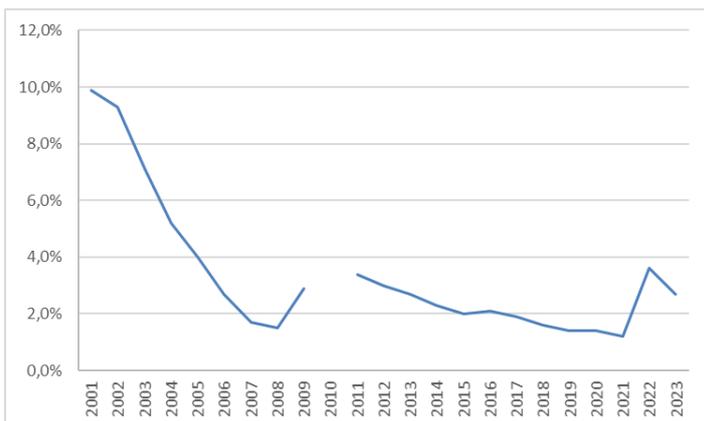


Figure 1. Percentage of population receiving subsistence benefit. Sources: author’s calculations based on absolute numbers from the Ministry of Social Affairs (2001-2022¹¹) and The National Institute for Health Development (2023¹²).

The usage of different terms is not always consistent. Energy poverty focuses solely on the usage of energy at home, while the subsistence benefit considers other expenses as well. Despite that, to illustrate the inconsistency, the notions and terms of energy poverty and inability to pay for energy are equated at the website [Energialgud](#), which is website maintained by national authorities even though the name of the maintaining institution is not disclosed.

The number of subsistence benefit receivers nearly tripled in 2022 because of the outbreak of the war in Ukraine, which resulted in an increase of asylum seekers and consequently also an increase in the number of recipients of subsistence benefit. Another reason was that in 2022, the subsistence level was increased on the 01.06.2022¹³ which also increased the number of persons entitled to receive subsistence benefit.

In 2020, the [Energy Sector Organisation Act](#) was amended¹⁴ by introducing the novel term of “*energiaostuvõimetus*” (*Inability to purchase energy*). The main reason of introducing the term was to ensure compliance of the act with the Energy Efficiency Directive. Neither “*energiavaesus*” (*energy poverty*) nor “*energiaostuvõimetus*” (*Inability to purchase energy*) are used in the following national development plans, suggesting that these terms hold marginal, if any, significance in the Estonian welfare and public administration system.

To conclude, it seems fair to say that Estonian policy makers have adapted the notion of energy poverty, which originates from the EU, to reflect the realities of Estonian welfare

¹¹ Ministry of Social Affairs of Estonia. Toetuste Statistika. Aegread 2001-2022. (*Subsistence benefits 2001 – 2022*, available in Estonian). Available at: <https://www.sm.ee/toetuste-statistika>.

¹² TAI. Sotsiaaltöö. Toimetulekutoetuste maksimine 2019.-2023.aastal. Uurimus/analüüs 11.juuni 2024. <https://www.tai.ee/et/sotsiaalto/toimetulekutoetuse-maksimine-2019-2023-aastal>.

¹³ Subsistence level and subsistence benefit. Available at: <https://www.eesti.ee/en/pensions-social-services-and-allowances/benefits-and-allowances/subsistence-level-and-subsistence-benefit>.

¹⁴ The draft version of the updated NECP2030 mentions the act was amended in 2019. (p.57). Tracking the act amendments reveals that the act has been amended a number of times, and the term „*energiaostuvõimetus*“ was introduced in 2020.

provision and public administration system and national social realities. The task of adopting the EU initiative was resolved by making changes at the level of discourse rather than by making changes at the level of welfare provision system. However, the vocabulary used in discourses is not as important as real improvements of energy efficiency of residential buildings and transport which is one of the central goals within the framework of the green turn or deal. Further developments are to be expected in the context of transposition of the EU Energy Efficiency Directive into the national legal system.

The notion of transport poverty

Aside from a few social media posts and mainstream media articles, which the authors of this report as Estonian residents have noticed from time to time, the concept of transport poverty has not received any significant attention in the public discourse. Aside from a few social media posts and mainstream media articles, the concept of transport poverty has not received any significant attention in the public discourse. Occasionally it has entered also political discussions.¹⁵ Neither the word “transpordivaesus” (*transportation poverty*) nor the word “transpordistuvõimetus” (*inability to purchase transportation*) is used in the national [Transport and Mobility development plan 2021-2035](#).

2.4. Fundamental rights impact assessment

The Development plan of Energy Economy until 2030 ([Energiamajanduse aregukava aastani 2030](#)), which is a policy document, includes a statement that it is important to assess the social impact of energy usage, so that the living environment becomes energy efficient (page 8). The [Energy Sector Organisation Act](#) (*Energiamajanduse korralduse seadus*) does not contain any obligations for respective impact assessment.

There is a general obligation to undertake impact assessment about proportionality of fundamental rights limitations in any legislative initiative - see the decision¹⁶ of the Estonian Parliament from 2020 Approval of [Basic Principles for Legislative Policy until 2030](#) (*Õigusloomepoliitika põhialuste aastani 2030 heakskiitmine*) – see item 12.3.1. The Ministry of Climate (*Kliimaministeerium*) is currently leading the preparatory work of the Climate Act (*Kliimaseadus*), where the principle of obligatory assessment of fundamental rights and social impact is not formulated explicitly as an imperative aspect of the new law, but in contains the principle to safeguard intergenerational justice (article 13) and just transition (article 14). The procedure of such impact assessment, for instance, such as frequency and guarantees, for instance remedies in the event of non-compliance with this requirement, is not stipulated. The Environmental Impact

¹⁵ See for instance an article at the [Riigikogu Toimetised](#) 44/2021 (*The Journal of the Estonian Parliament*), where during a roundtable of Parliament members on the topic of inequality one discussant used the expression ‘energy poverty’.

¹⁶ A ‘decision’ of the Estonian Parliament is a soft law instrument to formulate policy goals and principles.

Assessment and Environmental Management System Act ([Keskkonnamõju hindamise ja keskkonnajuhtmissüsteemi seadus](#)) contain no provisions for such assessment.

3. Addressing different aspects of energy efficiency and energy poverty: The selected project [‘Reconstruction grants 2022-2027’]

The project [‘Reconstruction grants 2022-2027’](#) will fund both the comprehensive renovation of apartment buildings and, as a single activity, the replacement of gas, stove, or electric heating devices in the heating systems of apartment buildings with devices that use renewable energy sources, or the connection of such apartment buildings to the district heating network. The supported activities will enable enhancement the energy efficiency of the apartment building and promote the adoption of renewable energy. This research focused on the renovation aspect of the buildings.

The grant provided under this [program](#)¹⁷ is aimed at increasing the energy efficiency of apartment buildings. It is funding a proportion – up to 55% of renovations costs with the condition that the building provides co-financing. In addition, the grant contributes to ensuring the safety of apartment buildings, achieving a better indoor climate, reducing energy costs, and promoting the adoption of renewable energy.

The supported activities under the action [“Housing Policy” of the program “Sustainable and Accessible Housing Stock,” within the program “Construction,” in the result area “Research, Development, and Business,” take into account the horizontal principles referred to in Article 9 of Regulation \(EU\) No. 2021/1060 of the European Parliament and of the Council](#). Support is evaluated based on the balanced regional development, accessibility, and environmental and climate goals, contributing to the EE2035 principles and targets, through the following indicators: 1) satisfaction with the living environment; 2) accessibility indicator; 3) net greenhouse gas emissions in CO₂ equivalent tons, including the land use, land-use change, and forestry (LULUCF) sector.

¹⁷ The program started in 2022. The action operates on a yearly basis. Concrete amount of activities for each year is determined by the funds for that year. The action budget for a concrete year is decided on a yearly basis, there is no predetermined distribution for the entire period.

For the period 2022-2027, 330 million euros for EU structural funds are allocated. The total budget for this round in 2024 is 170 million euros. The grant application round for Ida-Viru County opens on January 14, 2025. On October 28, 2024, opens the application round in Ida-Viru County using funds from the Just Transition Fund.

"The main goal, after all, is to ensure that support for apartment buildings is ongoing, so we can secure funding and refurbish these apartment houses. Because the impact there is greatest on the energy sector, the security sector, and people's well-being. So, this is definitely the area where support is needed and urgently required./.../"

"Meie peamine eesmärk on tagada, et toetus kortermajadele oleks järjepidev, mis võimaldab saada rahastust ning neid kortermaju renoveerida. Sest sellel on kõige ulatuslikum energiasektorile, julgeolekusektorile ja inimeste heaolule. Seega on tegemist valdkonnaga, kus on kiiresti vaja toetust".

3.1. Leaving no one behind – target groups, eligibility, accessibility, equality

The program does not specify target groups. Instead, the program aims to provide financial support for the renovation of apartment buildings without consideration of who owns or lives in the apartments. The decision to renovate is viewed as an internal matter for apartment associations, with no intervention from the state.

The 2024 regulation issued by the Minister of Infrastructure allocates funds separately for different counties and types of buildings. Several interviewees highlighted that apartment associations consist of homeowners from various socioeconomic backgrounds. The program does not consider individual vulnerability. Poverty is addressed through a separate mechanism—the social welfare system—which provides services and benefits to households. This system also assists in mitigating issues caused by high heating bills or renovation loan repayments. Judging by the lack of planned major restructuring or changes, the system appears to be effective.

In order to study the practical effect and challenges of the program, interviews were conducted with various stakeholder groups. The majority of the interviewees expressed the view. That the program itself is not directly addressing the social background of individuals, since the eligibility to apply and get the support rests withing apartment associations and not its inhabitants. It is a collective decision. The following quote illustrates the situation:

"./.../ The applicant is the apartment association. The apartment association cannot somehow be in a vulnerable position. ./.../"

“Taotleja on korteriühistu. Korteriühistu ei saa kuidagi olla nõrgemas olukorras”.

However, within the process of reaching the decision whether to apply or not for the support various social and economic factors may become significant. This is because the necessity of co-financing is divided proportionately between inhabitants, yet the individual impact may affect various groups disproportionately. These factors are related to the economic well-being, subjective perceptions of one’s life quality and expectancy, influence of significant others, just to give some examples.

Regarding access challenges two layers can be distinguished. The first are structural and related to the composition of the society and geographical location. All interviewees refer to the ageing of the society, which may create divergent views among the inhabitants towards the program. Those who are younger usually see added benefit in improving their living standards and also the future added value of the house/appartement. Those who are older may be more content with the status quo.

“There are young people who wish to improve the building, which is in a very bad condition. But the retired people are against”.

“Seal on nooremad inimesed, kes soovivad hoone parendamist, sest see on väga halvas olukorras. Kuid pensionärid on vastu”.

“/.../ We've been thinking about what to do ourselves, but there's not much we can do because the association decides. That's a bit of a bottleneck here; even if someone votes against it, they still have to pay that loan”

“Me oleme ka ise mõelnud, mida teha, kuid palju ei olegi teha, sest korteriühistu otsustab. Siin on pudelikael. Isegi kui osad hääletavad vastu, siis neil tuleb ikkagi laenu tasuda”.

There are implicit challenges arising from geographic disparities, with rural and economically disadvantaged areas experiencing more pronounced access barriers. These barriers manifest in difficulties accessing loans due to low property values and lack of financial resources to manage renovation costs.

The second challenge is related to the technical features of the support program, which necessitates access to the respective e-platform. With some exceptions, the interviewees confirm that the so-called digital access gap can be avoided. The following quote illustrates this view.

“/.../ Since the distribution is so varied, right, there's someone in the building who can complete the application process. We are not aware of anyone not applying because they can't access the internet.”

“Kuivõrd erinevused on suured, siis on hoones siiski alati keegi, kes saab taotluse protsessi lõpule viia. Me ei ole teadlikud sellest, et keegi ei saanud esitada taotlust internetile juurdepääsu puudumise tõttu.

From the other side, some promising practices can also be distinguished. For instance, allocating funds based on regional needs ensures a more equitable distribution of resources, helping to bridge the gap for less active or financially weaker regions. The idea is to use this program as a mechanism to narrow the historically rooted gap in income levels and economic well-being between the main rural areas and more remote areas¹⁸. Another example is compulsory involvement of technical consultants to support apartment associations through the application and renovation processes is identified as a promising practice, mitigating administrative burdens and aiding organizations with less expertise. The third is the provision of loans and financial guarantees by KredEx for economically disadvantaged groups assists in overcoming financial barriers, especially when commercial banks are unwilling to extend credit. The last aspect is to assist the beneficiaries overcome specific burdens of the application process. The following quote summarises different challenges faced by apartment houses’ owners considering applying for the grant.

“/.../ work delays, contractor bankruptcy, repeated tenders, procurement errors, maybe also... those materialized various fraud risks... Well, nobody really wants to see an auditor in their house, you know. Those European Union rules are relatively strict, so yes, there have been instances when a claim is made back on the building./.../”

“... töö viivitused, töövõtja pankrot, korduvad pakkumised, hange vead, võib-olla ... pettuse ilmingud. Keegi ju tegelikult ei soovi majja audiitorit. Need Euroopa Liidu reeglid on suhteliselt ranged, ning on juhtumeid kus kogu majale on esitatud tagasimakse nõue ...”

To summarise, the program’s eligibility is based strictly on objective building parameters, and it therefore does not contain provisions aiming to prevent discrimination based on individual characteristics. The emphasis is on supporting building associations and not individuals.

The interviewees seem to share the perception that the question of potential unequal access or discrimination is only related to the situation within the apartment building in the context of inhabitants’ individual characteristics, and not to the program set up. This means that while all apartment buildings in Estonia which are eligible to apply are treated equally, then the question which buildings will actually apply depends on the internal composition of the owners. The following quotes illustrate this perception.

“We cannot have such classical discrimination. For the same reason again - we do not communicate with each apartment owner. We communicate with the

¹⁸ Please see for specific rates the information from Kredex respective site. Available at: <https://kredex.ee/en/kodudkorda>

association. So, we can't, it's not possible, in this system... It's not, there's none of it here... Even if someone would ever want to do it, it's not possible to implement./.../”

“Meil ei saa olla klassikalist diskrimineerimist. Samal põhjusel, et me ei suhtle iga korteriomanikuga. Me suhtleme korteriühistuga. Seega see ei ole siin süsteemis võimalik. Isegi kui keegi sooviks seda teha, ei ole see võimalik rakendamise etapis”.

“The association’s organism is very complex. There are many different persons starting from directors to those performing more simple jobs. They are all in one unit in connection to the support program”.

“Korteriühistu on keeruline organism. Seal on palju erinevaid inimesi alates direktoritest kuni lihtsama töö tegijateni. Nad on kõik ühes grupis toetusprogrammi aspektist”.

From the other side, there does not appear unequal treatment caused by language or ethnicity. This appears the common perception of stakeholders from various sectors. However, some interviewees make a connection between willingness to participate in the program and the overall trust of the majority of the inhabitants in the building towards the public administration system in Estonia. It also has an ethnic aspect where Russian speakers may be more reluctant to participate in the program. However, the majority of interviewees said that they had not noted significant differences between language groups vis-à-vis program participation. Here is what an interviewee claimed.

“I have not assessed from the perspective of minorities. But in my estimation Russian language speaking persons or individuals from other minority groups do not understand the program differently”.

“Ma ei ole hinnanud vähemuste aspektist. Kuid minu hinnangul ei mõista vene keelt kõnelevad inimesed või teised vähemuste grupid seda programmi erinevalt”.

Views of the interviewees also allow to put forward these practices. Strategies like local information days¹⁹, use of press releases²⁰, and collaboration with stakeholders such as housing associations have proven effective in disseminating information and encouraging program uptake. Introducing innovative financial models and policies, such as varied support percentages for different regions and direct KredEx loans to mitigate financing gaps, represent transferable solutions that could be adapted in similar settings. The electronic application environment (SFOS) with automated functions sets a precedent for reducing manual errors, highlighting a scalable system design element that can ease administrative strain for both applicants and implementers²¹.

At the individual level, people in vulnerable situations receive no special consideration in this program. However, at a broader level—such as by region, settlement type, or

¹⁹ See for instance information days by Kredex, information is at the respective homepage of the institution. Available at: <https://kredex.ee/et/infopaevad-kortermajade-renoveerimisest>

²⁰ See for instance press release of the Estonian Union of Co-operative Housing Associations from 28 November 2024 regarding introduction renovation grants. Available at: <https://ekyl.ee/2024/11/28/mustamael-toimub-kortermajade-renoveerimispaev/>

²¹ Please see parts 3.4. and 4.2. for more specific information on the issue.

building type—higher levels of renovation support are provided.²² Consequently, individual homeowners in these categories are eligible for increased financial support. Nonetheless, these distinctions do not account for individual vulnerabilities. This approach means that well-off individuals may receive higher support, while people in vulnerable situations outside these categories may not receive this additional support.

When considering renovations and developments under the program, compliance with accessibility standards such as ramps, handrails, and proper lighting was mandated. This embraced principles from the European New Bauhaus initiative, aiming to create environments adaptive to all community members, including those with disabilities. The interviewees' have emphasized that this aspect is needed to achieve more comprehensive positive impact.

3.2. Impact

Below is summary of the views from interviewees. In reality, it is the individuals who are directly involved in many areas of the program to assess its impacts.

Short-term impacts are the following:

- Economic. The program immediately benefits apartment residents by improving living conditions, reducing energy costs, and enhancing indoor climates, remains fragmented. However, the economic benefit may not be always present, since savings on energy costs are replaced by the obligation to pay the reconstruction related loan.
- Localities. In the short term, active localities that successfully apply for grants may experience a boost in local construction activity and increased property values. Renovations are seen to stimulate neighbourhood community engagement and set off a "ripple effect" where one renovated building inspires others nearby to undertake similar upgrades.
- Society. At a societal level, the program contributes to the larger goals of energy efficiency and greenhouse gas reduction, aligning with Estonia's environmental objectives in NECP.

Long-term impacts remains largely speculative since the programs have just started. According to the interviewees' opinions, it is visible as follows:

- Individuals. Participants gain from sustained reductions in energy use and costs, which can translate into increased financial stability and enhanced quality of life. For property owners, long-term impacts potentially include increased property

²² For instance, in the two largest cities in Estonia – Tallinn and Tartu, the proportion of support is up to 30% of the eligible costs, whereas in the other areas of Estonia the proportion is up to 50%.

values and extended building lifespans without needing further major repairs. However, this needs to be contrasted with the immediate financial obligations, which may overshadow the efficiency gains.

- Localities. Positive effects manifest as improved infrastructure resilience and boosted local economies from higher housing demands and sustained construction projects. However, localities with less access to program benefits, for instance in southern Estonia and the islands, face the risk of widening economic and societal divides.
- Society. On a larger scale, the program supports national environmental goals, contributing to reduced national energy consumption and carbon footprints. Long-term societal gains also include fostering sustainable development practices in housing policies and enhancing urban planning strategies.

Negative or conflicting impacts identified are the following:

- Economic burden. Short-term financial strain is observed due to loan obligations associated with renovation costs, potentially leading to increased living expenses, which can disproportionately affect lower-income residents and older individuals. The interviewees have claimed that although the grants enable to considerably enhance the living conditions in individual apartments, this may be off-set by having to pay the saved amount for the loan. As claimed by an Estonian academic Jarek Kurnitski, the average saving obtained through the reconstruction is 1,5 euro per square meter.²³
- Exclusion of renters and non-house owners. The focus on property owners tends to marginalize renters and residents in non-traditional housing arrangements, excluding them from direct benefits and potentially exacerbating socioeconomic inequalities. This also applies to some categories of owners not being eligible for support – those who are private home owners. However, there is a recent reconstruction program which targets directly individual houses or houses with up to two apartments or terraced houses.²⁴
- Market distortions. There is a concern about property value inflation in renovated localities, potentially pricing out economically weaker sections or new buyers, leading to a risk of gentrification.
- Systemic disparities. Regions and communities with less access to funding or technological resources face challenges, as discrepancies in funding cycles and implementation consistency can delay benefits and overwhelm smaller associations. Overall, it can be said that further a location from the main cities of Tallinn and Tartu, the higher is the perceived financial risk by credit institutions. This may be translated into higher interest rates for loans given to municipal

²⁴ See information from the Kredex homepage. Available at: <https://kredex.ee/en/majaduueks>.

buildings in more remote areas.²⁵ Concrete regional statistics are available from the database of Statistics Estonia ([Statistikaamet](#)).

3.3. Information, communication and social acceptability

The following aspects have been highlighted by the interviewees on the basis of their comprehensive engagement with the program.

- General awareness. Interviewees uniformly indicate that the program's existence is generally well-known, particularly among key stakeholders and direct beneficiaries, such as apartment associations and technical consultants. This is largely attributed to targeted outreach and the information dissemination efforts employed by the implementing agencies like [KredEx](#) and the Ministry of Climate.
- Accessibility for different groups. Information about the program is accessible primarily online, available in Estonian, Russian, and English, ensuring linguistic inclusivity to cater to the main language groups within Estonian housing communities. Although the programme is focusing on the apartment association as beneficiaries, the grant enables to address some specific needs of persons with disabilities, for instalment of ramps and handrails to move between the floors and renovation of elevators. However, due to financial limits, the practical possibility for the installations of new lifts as part of reconstruction is often not feasible, and therefore the needs of persons with disabilities remain unaddressed in this regard. It can be further said that once the building is renovated, it affects positively all inhabitants living in it, including persons with disabilities. Although some interviewees suggested that communities where the primary language is Russian are less interested to apply to the program support, there does not appear evidence thereto and it remains speculative.
- Efforts to raise awareness. There are various strategies in place, such as the use of press releases, websites, and regular information days organized at regional centers²⁶. Most interviewees noted that these events are crucial in raising

²⁵ The statement that financing from banks is somehow in correlation with the location of the property is speculative and difficult to verify, since the banks' official language' rejects such statements. However, an informal inquiry by the Estonian National Broadcasting reveals that such statement is not fully without a merit: Merilin Pärli, *Suur ülevaade: kellele, milleks ja mis tingimustel pangad kodulaenu annavad*, Estonian National Broadcasting (*Eesti Rahvusringhääling*), 23.08.2019

²⁶ See references at the last paragraph of part 3.1. of this report.

awareness and encouraging participation, especially through face-to-face engagements which provide guided support to potential applicants. Some interviewees highlighted the effectiveness of technical consultants who assist associations throughout the process, bridging certain accessibility gaps.

Overall perception. The program enjoys a generally positive reception among the broader society, attributed to its alignment with significant social benefits like energy savings and improved living conditions. Beneficiaries express appreciation for the support, while scepticism persists mainly about implementation efficiency and resource distribution.

Controversies and reactions are related to the complexity of the application procedure, which necessitates sometimes several years preparation period. There are no statistical surveys yet to assess the results of the program. The reaction spectrum ranges from direct beneficiaries who are supportive, to critical voices among those who feel neglected or disadvantaged by current structures. Discontent is also voiced by non-beneficiary taxpayers questioning why similar supports are not extended to private homeowners. However, as shown above, there is a new initiative to close this gap.

“I have heard from the side that people think that the conditions for applying are so difficult and complex. That there is no sense in starting to apply, because anyhow they will not get it and do not know how to make the documents”.

“Ma olen kuulnud inimeste arvamust, et taotlemise tingimused on keerulised ja rasked. Et ei ole motet taotlusega alustada, sest niikuinii toetust ei saada ning inimesed ka ei tea, kuidas dokumente vormistada.

Tailoring communications to reach diverse and underrepresented groups by locally resonant messaging can boost perceived relevance and support. It is especially important to highlight that information about the program is available in the main languages spoken by apartment buildings inhabitants – in Estonian and Russian.

“/.../ Estonian and Russian are the primary languages, as these two are the main languages in the existing apartment buildings.”

“Eesti ja vene keel on peamised keeled, sest need on kaks peamist keelt olemasolevates kortermajades.

The main barrier cited by the interviewees is the uncertainty when new support programs will open and the perceived complex system of application. The latter aspect may be epistemic misconception. This is because information spreading, as confirmed by the interviewees, is conducted in various formats and in principle reaches all potential beneficiaries.

“It's all on an online website, and there are also some printed materials available, which are distributed at events. There is a paper version available as well. But, well, in today's context of the green transition, I understand that there is always an effort to reduce those printed materials. However, there are still some prints available.”

“Kõik toimub online veebilehel, kuid üritustel jaotatakse ka trükimaterjale. Paberversioon on samuti olemas. Kuid kaasaja rohepöörde tingimustes on pingutus prinditud materjalide vähendamiseks arusaadav. Ometi on prinditud materjalid olemas”.

The interviewees discussed the following promising practices. First, centralized application system. The use of platforms like SFOS provides a centralized, streamlined approach to processing applications, noted as positively impacting application clarity and efficiency. Malfunction of the system²⁷ in concrete situations does not mean that the system as a whole cannot be viewed as a promising practice. Second, localised outreach. Tailoring communications and strategically holding informational events in various regions ensures broader reach and engagement, for instance through the regional offices of the [Estonian Union of Co-operative Housing Associations](#). Third, the involvement of technical consultants, whose involvement is mandatory for providing specialized expertise in the application and renovation process.²⁸ The role of technical consultants is explained in detail at the homepage of Kredex ([available in the Estonian language](#)). Offering experienced consultants to guide associations through the complex application and renovation processes is highlighted as a good practice, helping to alleviate administrative burdens.

3.4. Stakeholder engagement and participation

The analysis of stakeholder engagement and participation is divided functionally into the stages of design and implementation. Since the program is still ongoing, its evaluation phase has not yet commenced.

Key stakeholders, including apartment associations, technical consultants, community organizations, and representatives from the Ministry of Climate and KredEx, appear to have been involved to some extent in the **design stage**. It is not clear whether their input helped shape the initial guidelines and ensure that the program's proposals were aligned

²⁷ This aspect will be discussed in more detail in part 3.5.

²⁸ It is obligatory to engage the technical consultant and present in the application documents also the agreement concluded with the consultant (see *Korterelamute energiatõhususe toetuse tingimused*, resolution of the Minister of Economy and Infrastructure from 11 March 2023, with amendments, RT I, 24.09.2024, 8. Available at: <https://www.riigiteataja.ee/akt/124092024008?leiaKehitiv> article 21 para 14). Articles 8 – 9 specify the conditions of the engagement of the technical consultant.

with community needs and industry best practices. On the other hand, it can be said that the main civil society actor in this context - the [Association of Co-operative Housing Associations](#) - played a pivotal role in developing the financial models that continue to guide program operations.

“Let us say that the Association of Co-operative Housing Associations has been engaged in the development of reconstruction support in practice for 30 years. The Association was established in 1996 and already then was present at the birth of the financial model of reconstruction support. ... The financial model which was then worked out is still in effect today”.

“Ütleme et korteriühistute liit on olnud seotud selle rekonstrueerimise toetuse arendamisega ligiüheks aastat. Liit asutati 1996 ning oli rekonstrueerimise finantsmudeli sünni juures. Tollel ajal väljatöötatud mudel on kasutusel tänaseni”.

“In Estonia is very active the Association of Co-operative Apartment Associations. Perhaps they were engaged”.

“Eestis on väga aktiivne korteriühistute liit. Ilmselt olid nemad seotud”.

The views of the interviewees are divergent on the matter of engagement in the **implementation stage**. Those involved in implementation and program development claimed wide consultations and incorporation of reasonable suggestions. Those representing the side of the beneficiaries implicitly suggested that despite the appearance of consultative processes, the decisions about the main features are the discretion of the ministerial level, who take into account suggestions which appear suitable to them.

The interviewees expressed the importance of stakeholder engagement throughout the program's lifecycle, from design and implementation to evaluation. During drafting the regulation, the Ministry of Climate arranged a feedback round where it asked stakeholder groups to give their opinions. These opinions were analysed by the ministerial officials and some of them were included while others not. This early engagement helped shape the program's objectives and strategies. For example, stakeholder suggestions led to adjustments in eligibility criteria for greater inclusivity and changes in outreach strategies to ensure wider accessibility.

The continuous engagement of different stakeholders is considered as a valuable resource, although resource-intensive. Stakeholder involvement increased the program relevance to the needs of its target audience, increasing its effectiveness and public acceptance. On the other hand, some concerns regarding perceived tokenism and the fact, that significant decisions seemed to be taken by the public administration institutions rather than resulted from consultations, were also expressed.

“Participation depends on the normative proposal. If it is of more serious nature, then engagement is wide, for instance courts, various ministries, universities, real estate and owners’ associations, and the League of Architects”.

“Osalus sõltub ettepaneku normatiivsusest. Kui see on kaalukas, siis on osalus laiem, näiteks kaasatakse kohtuid, ministeeriume, ülikoole, kinnisvara ettevõtteid ja arhitektide liit”.

While formal structures were in place for stakeholder feedback in initial phases of the [programme](#) further engagement was lacking, according to some interviewees. This gap meant that some valuable informal insights and grassroots-level feedback may not have been fully captured or incorporated into the program, potentially leading to missed opportunities for refining program execution. However, others emphasized the importance of stakeholder engagement throughout the program’s lifecycle, from design and implementation to evaluation. It cannot be excluded that the consultation process was triggered by the need to create an impression of community engagement, that is to create the consultations ‘veil’, whereas the real decisions were already made.²⁹

“/.../ So, the conditions for granting support are a classic compromise based on the funder’s rules. Certainly, there are aspects that one group or another isn’t satisfied with. It could be one way or another. But overall, it’s still the best possible option. /.../”

“Niisiis of toetuse tingimused klassikaline näide kompromissist rahastaja reeglite järgi. Loomulikult on aspekte, millega üks või teine grupp on rahulolematu. See võinuks olla nii või teistpidi. Kuid üldiselt on see siiski parim võimalik lähenemine”.

Since the program is targeting apartment houses, the matter of inclusion of different groups can be raised indirectly in relation to the composition of who are the inhabitants of concrete houses. All interviewees have confirmed that there has been no socio-economic differentiation³⁰ between various groups. However, the interviewees have described certain measures which have been applied in the preparation process for grant application by various apartment associations. The goal is to make certain that all groups have equal access to information and realize that the house where they are living has equal opportunity to apply for the support. Some specific measures were put forward.

There was an active effort to reach minority and hard-to-reach communities through established channels like community leaders and organizations directly engaged with these populations.³¹ This strategic approach helped bridge the gap between the program and potential beneficiaries who might otherwise be overlooked or unaware of the opportunities available.

²⁹ For detailed proposals and comments as well as reactions of the Ministry of Climate, see page 17-63 of the regulation explanatory note. Available at: <https://kredex.ee/sites/default/files/2024-09/Seletuskiri%2017.09.2024.pdf>. "

³⁰ Socio-economic differentiation is the process by which individuals or groups in a society are distinguished from one another based on economic and social factors, such as income, education, occupation, and access to resources and opportunities.

³¹ See above activities of the Union of Co-operative Housing Associations

Language and communication accessibility. Recognizing linguistic diversity, particularly in regions like Ida-Virumaa, materials were made available in both Estonian and Russian. This bilingual approach ensured that language barriers did not prevent communities, especially in predominantly Russian-speaking areas, from accessing essential program information.

Technological accessibility. Despite the emphasis on digital application processes, which streamlined access and participation, interviewees noted the assumption that all associations had digital competency. To mitigate this gap, some support structures were put in place, including regional consultants who could provide assistance with the application process.

Financial support and inclusivity. To ensure economic disparities did not hinder participation, mechanisms like loan guarantees and direct loans from KredEx addressed financial barriers, especially in rural or economically disadvantaged areas. By offering these financial safety nets, the program could broaden its reach to associations that might otherwise be excluded due to a lack of initial capital or access to bank loans. For instance the support rate for the main cities – Tallinn and Tartu is 30% of the total costs, whereas for the rest of Estonia the rate is 50%.³²

The requirement for hiring technical consultants was introduced in December 2023 into the [regulation of the Minister of Economic Affairs and Communication](#) concerning support to the reconstruction of apartment buildings. The engagement of the technical consultant is not obligatory when there is partial renovation. The role of the technical consultants is, in concrete, to advise the recipient of the financial support in composing budgets, conduct procurement processes, determine the timetables and other processes. The consultant's role is primarily important in the pre-construction stage, but also in the later stages. It is up for the apartment building association to determine the exact scope of services required.

Inclusivity. While steps were taken to be inclusive, the interviewees generally acknowledged ongoing challenges in fully engaging certain vulnerable and marginalized groups. The lack of targeted support for specific socio-demographic profiles, such as low-income households, emphasizes the need for more nuanced approaches that directly address their unique barriers.

3.5. Governance and accountability, data and monitoring

³² See Kredex, reconstruction grant 2022 – 2027, important conditions. Available at: <https://kredex.ee/en/kodudkorda>

The program's actions are monitored, but only [technical and financial indicators](#) have been tracked so far. For instance, this report mentions on page 4 that the renovation support is distributed unequally in proportion to the housing situation, and points out that in worse situation continue to be the regions in South-East, North-West and North-East of Estonia. No social impact evaluations have been conducted, nor have any relevant statistics been collected. The absence of targeted monitoring for specific vulnerable groups means that unintended negative impacts on these populations may go unaddressed, potentially widening inequalities. Available information and statements of the interviewees' reveal that there have been no cases related to equality and non-discrimination.

Until now, no monitoring and social impact analysis has been carried out, so it is impossible to tell if a presence/absence of data and monitoring has had any effect on different groups. However, it can be said that important of attention to this aspect is acknowledged by Estonian academic circles.³³

The suggestion of the authors of this report is to keep monitoring current KPIs. We also suggest to expand the range of indicators and include also social impact indicators. Finally, we suggest carrying out some social impact analysis. It is important to provide transparent and easily accessible datasets about applications and their status in the approval process.

Remedies include administrative complaints (pre-court proceedings) to the funding authority, and judicial complaints to the administrative court. These remedies follow the general administrative procedural norms, there are no special remedies created only for this program. Among the remedies is also a complaint to the Chancellor of Justice, whose role is limited only to reviewing the constitutionality of regulation. The Chancellor has no mandate to interfere in individual cases. It appears that the availability of potential remedies can be labelled as common knowledge, and the choice of a specific remedy is dependent on whether the claimant directs the claim against the regulation or its implementation.

“/.../the appeal is submitted to the implementing unit. A general complaint. But if there are issues with the decision to either grant or deny, or with satisfaction, then it's submitted to us—the Ministry. And then the external funds team handles it./.../”

“/.../Et antud juhul esitatakse vaie rakendusüksusele. Üldine kaebus. Aga kui on siis probleeme kas rahuldamise või rahuldamata jätmise otsusega, rahul olemisega, siis esitatakse meile. Ministeeriumile. Ja vastav siis see välisvahendite meeskond selle lahendab./.../”

³³ See for instance an interview by member of the Estonian Academy of Sciences Jarek Kurnitski to the science portal innovator in February 2024, where he discussed the wider implications of renovation. Available at: <https://novaator.err.ee/1609245696/teenetemargi-laureaat-kurnitski-aitasin-tuua-hoonetesse-hea-sisekliima>

According to most interviewees, there have been no court cases related to the program.

However, the interviewees had divergent views on the effectiveness of administrative court proceedings. The dilemma emerged after the technical malfunction of the e-application system in the last round for renovation support in September 2024. Several apartment houses which had prepared all necessary documentation for application were prevented from submitting the application since there was an overload of traffic. Once they were able finally to submit the application, the system indicated that the allocated financial amounts were already exhausted, and their applications were rejected. Some interviewees suggested that recourse to administrative court would not constitute an effective remedy, since the courts would only be able to acknowledge the violation of their right to apply for the support, but not have the discretion to speculate about the outcome of their application, had it been accepted. The others had the view that the administrative courts have the option to declare the proceedings unconstitutional, subsequently annul all the results, and obligate the authority to conduct the application process again.

According to the opinion of the Estonian Chancellor of Justice, the remedies system is vital for transparency and for maintaining program accountability, allowing participants and stakeholders to voice concerns and seek redress effectively. Regular redress mechanisms apply – to courts. The barriers related to state fees which may have existed to complain against decisions of apartment associations are changed by now.³⁴ According to the Chancellor, complaints in relation to state procurement may halt the construction process.

³⁴ For reference see the opinion of the Chancellor of Justice concerning high court fees from 2014. Available at: https://www.oiguskantsler.ee/sites/default/files/field_document2/6iguskantsleri_seisukoht_vastuolu_mitte_tuvastamise_kohta_korteriuhistu_uldkoosoleku_otsuse_kohtus_vaidlustamine.pdf

4. Conclusions and key recommendations

4.1. Main effects

The renovation grants have double effect in Estonia's apartment buildings context. Effects can be viewed at the level of apartment owners and more generally at societal level. For owners, from one side, the positive, there are reductions in energy consumption and greenhouse gas emissions. Into this side also belong improved living conditions, including better indoor climates, which have positively affected residents' quality of life. The grants have helped modernize older facilities and increase property values, fostering enhanced neighbourhood pride and investment in sustainability. From the other side, the immediate economic effect upon owners is doubtful, since the savings from energy consumption are offset by the monthly loan payments which the apartment building has taken out to co-finance the renovation project.

At the societal level double effect can also be concluded. From the positive side, the economic benefits are realized through heightened activity in the local construction market, with funds largely staying within the Estonian economy and promoting small and medium-sized enterprises. The program supports national and EU environmental goals, contributing broadly to ecological sustainability and enhancing communal and personal investment in the living environment. From the other side, criticism of the program is primarily in connection with the uncertainty when funds become available and how they are dispersed. The interviewees were quite critical of the recent fiasco with the electronic application system, suggesting that it can lead to look for alternatives to the program support.

Quote: *"This can create in the associations the so-called renovation tiredness"*.

Original statement: *"Siis see võib tekitada ühistutes sellise nagu renoveerimisväsimuse"*.

4.2. Challenges and gaps

The interviewees and additional research identified primarily challenges and gaps related to the utilitarian side of the program. This means that the overall set-up remains largely outside of critique. The challenges and gaps related to practice can be divided, first, into program implementation and, second, into accessibility.

In the implementation category stand out funding issues. These are recurrent, with continuous concerns over stable and predictable financial allocations, limiting long-term

planning for associations and leading to funding shortfalls amidst high demand. Technical issues, including system malfunctions during critical application periods, further complicate access and engagement with the program.

"/.../ The main issue, though, is finding funding, and we get bits and pieces from different places. Ideally, we would have stable funding, but in the world of external resources, stable funding isn't really achievable./.../"

"/.../. No mis on nagu põhiprobleem, on rahastuse otsimine ja nipet siit, näpet sealt me saame. Noh, meie ideaal oleks ikkagi stabiilne rahastus, aga välisvahendite maailmas see stabiilne rahastus vist ei ole päris realselt saavutatav./.../"

Additionally, procedural complexities and bureaucratic hurdles present challenges. These become evident particularly during application and implementation phases, often seen as cumbersome barriers limiting engagement and process efficiency.

In the accessibility category, equity concerns arise with unintended fiscal burdens on residents due to renovation costs and associated loan repayments, potentially impacting low-income households disproportionately. The technical and digital capacity requirements for applying to the program hinder participation for some, emphasizing the need for broader access to resources and technological support. A lack of targeted support for vulnerable groups, such as older residents and those in financially precarious positions, remains a notable gap.

"/.../ expenses inherently rise and surely there are those for whom this twenty percent increase in costs is... well, it's very difficult for them. /.../"

"/.../ iseenesest kulud tõusevad ja kindlasti on neid, kellel tegelikult ei ole seda paarkümmend protsenti kulude tõusu nagu... No mis on nende jaoks nagu väga raske./.../"

4.3. Lessons learned and good practices

The following lessons were learned in the course of research into this program.

There is a need to streamline the application and implementation processes to enhance accessibility and mitigate bureaucratic delays. Simplifying regulatory frameworks could provide a more user-friendly interface for prospective applicants, as it would decrease the scope of materials needed for the application. As illustrated by the quote below, some apartment buildings need significant time to prepare the grant application, and uncertainty may be an inhibiting factor.

"/.../ If we could always know, if we could say today that we have, for example, a certain volume available in 2025, then that would be great because the preparation periods for cooperatives are a couple of years, you know. But we can never say that in advance. /.../"

"/.../ Oleks meil kogu aeg teada, me saaksime täna öelda, et 2025 on meil näiteks selline maht olemas, siis see oleks väga hea, sest ettevalmistusperioodid on ühistutel paar aastat, on-ju. Aga me mitte kunagi ei suuda seda ette öelda./.../"

Strategic communication and predictable funding allocations are crucial to maintaining stakeholder confidence and ensuring the program's momentum.

Better engagement with underrepresented and vulnerable groups can optimize program outreach and result in more equitable benefits distribution.

The following promising practices can be put forward.

Use of technical consultants supports associations in navigating complex renovation processes, serving as a model for enhancing program accessibility and participant readiness. The engagement of technical consultants can also have a practical effect of helping to minimize the risk of administrative mistakes and therefore avert possible claims.

Communities witnessing successful renovations often experience a "neighbourhood effect," where initial successes inspire broader community engagement and investment.

4.4. Recommendations

Stable funding is essential to maintain confidence in the program and create the potential for sustainability. It is necessary to implement consistent, predictable funding allocations to aid long-term planning for associations and ensure sustained program engagement and participation.

It is time to move towards targeted support. For this is needed development of measures tailored specifically to vulnerable groups. This would ensure that no demographic group is disproportionately impacted by financial constraints or system inequities.

The program needs to broaden stakeholder engagement. It is important to engage broadly with a diverse range of stakeholders, actively incorporating feedback into program iterations to continuously refine objectives and strategies. There needs to be an effort to listen to what the potential beneficiaries are saying.

In order to understand the full effect of this program, proactive monitoring needs to commence. In ideal world there needs to be regular impact assessments and real-time

data analysis to swiftly adapt strategies according to ongoing feedback. This would promote a responsive and inclusive program environment.

Annexes

Annex I. Design of the action

Information about the action	
<p>Objective Please include:</p> <ul style="list-style-type: none"> • Objective • Area of contribution • Explicit focus 	<p>Objective The grant will fund both the comprehensive renovation of apartment buildings and, as a single activity, the replacement of gas, stove, or electric heating devices in the heating systems of apartment buildings with devices that use renewable energy sources, or the connection of such apartment buildings to the district heating network. The supported activities will enable the energy efficiency of the apartment building and promote the adoption of renewable energy.</p> <p>Area of contribution The grant provided under this regulation is aimed at increasing the energy efficiency of apartment buildings. In addition, the grant contributes to ensuring the safety of apartment buildings, achieving a better indoor climate, reducing energy costs, and promoting the adoption of renewable energy.</p> <p>Explicit focus <u>Objectives</u> of Grant Provision, Output, and Outcome Indicators (1) The objectives of grant provision are: 1) achieving energy efficiency and a better indoor climate in apartment buildings; 2) ensuring the safety of apartment buildings; 3) promoting the adoption of renewable energy; 4) reducing energy dependency and greenhouse gas emissions; 5) improving the living environment. [Riigi Teataja (<i>State Bulletin</i>) I, 24.09.2024, 1 - entered into force on 27.09.2024] (2) The provision of the grant contributes to achieving the following output indicators set in the list of measures: 1) residential units with higher energy efficiency; 2) number of residential units in improved apartment buildings. (3) The provision of the grant contributes to achieving the following outcome indicators set in the list of measures: 1) estimated greenhouse gas emissions; 2) annual consumption of primary energy.</p> <p>§ 6. <u>Supported Activities</u> (excerpts) (1) Supported activities are: 1) Renovation and insulation of façades, including the design, production, and installation of pre-manufactured elements (hereinafter pre-fabricated elements) and associated works;</p>

	<p>2) Renovation and replacement of balconies and loggias, balcony construction, installation of glazing, and associated works;</p> <p>3) Renovation and insulation of roofs and ceiling structures, including the design, production, and installation of pre-fabricated elements and associated works;</p> <p>4) Replacement or renovation of windows, exterior doors, and fireproof doors, along with associated works;</p> <p>5) Renovation and insulation of basements and associated works;</p> <p>6) Renovation and insulation of foundations and associated works;</p> <p>7) Replacement, renovation, and balancing of heating systems, replacement of heat exchange units, preparation of heating system balancing protocols, and associated works;</p> <p>8) Installation, replacement, or renovation of water systems from the building's water inlet to the apartment water meters and sewage systems from apartment connections to the main sewer, including the construction and renovation of systems for stormwater absorption, reuse, or drainage, and associated works; [Riigi Teataja I, 24.09.2024, 1 - entered into force on 27.09.2024]</p> <p>9) Construction or renovation of a heat recovery ventilation system, preparation of ventilation system measurement protocols, and associated works;</p> <p>10) Construction of a cooling system or integration of a cooling device into the central ventilation system;</p> <p>11) Purchase and installation of equipment necessary for the use of local renewable energy, and associated works;</p> <p>12) Partial or complete renovation of the elevator control system and drive, or replacement of the elevator, along with associated works;</p> <p>13) Replacement or renovation of the electrical system in common areas from the building's connection board to the apartment electricity meters, including the installation of electric vehicle charging infrastructure and creating the possibility for external power connection to the heat exchange unit, and associated works; [Riigi Teataja I, 24.09.2024, 1 - entered into force on 27.09.2024]</p> <p>14) Installation of thermal insulation for windows in common areas and apartments, and restoration of interior finishes resulting from heating, ventilation, water, and sewage system construction;</p> <p>15) Construction or installation of ramps for building access, renovation of vestibules, installation of handrails, installation of disability lifts, and construction of elevators meeting the requirements of EVS-EN 81-70 or equivalent standards, along with associated works;</p> <p>16) Connection fees and works within the property boundaries for joining the district heating network;</p> <p>17) Construction or renovation of a waste collection building or purchase and installation of a deep collection container;</p>
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	<p>18) Construction or renovation of a bicycle parking area; 18^1) Construction or renovation of a playground; [RT I, 24.09.2024, 1 - entered into force on 27.09.2024] 18^2) Purchase and installation of outdoor furniture, including benches; [RT I, 24.09.2024, 1 - entered into force on 27.09.2024] 18^3) Restoration of landscaping; [RT I, 24.09.2024, 1 - entered into force on 27.09.2024] 19) Purchase and installation of equipment necessary for ensuring energy security and fire safety, and associated works; 20) Preparation of construction projects necessary for the works listed in points 1–19, conducting construction research and building audits; 21) Use of a technical consultant service in accordance with § 9, subsection 1; 22) Performance of owner's supervision. (2) As a single supported activity, it is allowed to: 1) Replace heating devices in gas, electric, or stove-heated apartment buildings with devices using local renewable energy; 2) Connect apartment buildings to the district heating network. (3) When granting support for the activity mentioned in subsection 2, the time limit for the building's use specified in § 4, point 6, does not apply. (4) No support will be granted for projects where renovation work has begun before the grant application is submitted to the implementing body. (5) Supported activities contribute to climate resilience and comply with the "do no significant harm" principle, meaning that they do not cause significant harm to any environmental objective specified in Article 9 of Regulation (EU) 2020/852. Supported activities comply with applicable environmental laws. (6) Supported activities take into account the principles of the New European Bauhaus.</p>
<p>Background <i>Please include:</i></p> <ul style="list-style-type: none"> • Starting date • Origin and development • Rationale • Stakeholders involved 	<p>Starting date The program started in 2022. The action operates on a yearly basis. Concrete amount of activities for each year is determined by the funds for that year. The action budget for a concrete year is decided on a yearly basis, there is no predetermined distribution for the entire period. For the period 2022-2027, 330 million euros for EU structural funds are allocated. For 2024, the total sum of grants is planned to be 170 million euros. The second round of grant applications opened on October 28, 2024, at 10:00 AM. The total budget for this round is 170 million euros, which is allocated across different categories: by counties, for renovation with pre-manufactured elements, for heritage and environmentally significant apartment buildings, for multiapartment building renovations, and for large apartment buildings. The grant application round for Ida-Viru County opens on January 14, 2025. On October 28, 2024, opens the</p>

application round in Ida-Viru County using funds from the Just Transition Fund.

Origin and development (excerpt):

§ 1. Scope of Application

(1) This regulation is established to implement the objectives of the measure “Supporting the Renovation of Apartment Buildings” under the intervention “Sustainable and Accessible Housing Stock,” part of the specific objective “Promoting Energy Efficiency and Reducing Greenhouse Gas Emissions” within the priority “Greener Estonia” of the Cohesion Policy Funds’ Operational Program for 2021–2027.

(2) The supported activities under the action “Housing Policy” of the program “Sustainable and Accessible Housing Stock,” within the program “Construction,” in the result area “Research, Development, and Business,” take into account the horizontal principles referred to in Article 9 of Regulation (EU) No. 2021/1060 of the European Parliament and of the Council, which lays down common provisions for the European Regional Development Fund, the European Social Fund+, the Cohesion Fund, the Just Transition Fund, and the European Maritime, Fisheries and Aquaculture Fund, as well as financial rules applicable to these funds and the Asylum, Migration and Integration Fund, the Internal Security Fund, and the Border Management and Visa Instrument (OJ L 231, 30.06.2021, pp. 159–706) (hereinafter “Common Provisions Regulation”).

Additionally, they contribute to maintaining the core principles of Estonia's long-term development strategy “Estonia 2035” (hereinafter “EE2035”), approved by the Riigikogu on May 12, 2021, and achieving the sub-objective “The Living Environment is of High Quality” within the main objective “A Living Environment that Meets Everyone's Needs, is Safe, and of High Quality.” Support is evaluated based on the balanced regional development, accessibility, and environmental and climate goals, contributing to the [EE2035](#) principles and targets, through the following indicators:

- 1) Satisfaction with the living environment;
- 2) Accessibility indicator;
- 3) Net greenhouse gas emissions in CO₂ equivalent tons, including the land use, land-use change, and forestry (LULUCF) sector.

Rationale

The [objectives](#) of grant allocation are:

- 1) achieving energy efficiency and better indoor climate in apartment buildings;
- 2) ensuring the safety of apartment buildings;
- 3) promoting the adoption of renewable energy;
- 4) reducing energy dependence and greenhouse gas emissions.

The grant allocation contributes to achieving the following outputs:

- 1) residential units with higher energy efficiency;
- 2) the number of residential units in improved apartment buildings.

	<p>The grant allocation contributes to achieving the following outcomes:</p> <ol style="list-style-type: none"> 1) estimated greenhouse gas emissions; 2) annual consumption of primary energy. <p>Stakeholders involved</p> <ol style="list-style-type: none"> 1. KredEx/Enterprise and Innovation Foundation (Implementing Agency) 2. Ministry of Climate (Policy Maker and Responsible Ministry) 3. Ministry of Finance (Main Responsible Body; Oversees European Union money) 4. State Support Services Center (Oversees and Audits the use of funds) 5. Technical Consultants (Assist apartment associations with applying and managing construction projects) 6. Apartment Associations (Applicants for the support) 7. Union of Housing Associations (Umbrella Organization) 8. Construction Companies (Carry out reconstruction work) 9. Local Governments (Receive administrative communication) 10. Heritage Houses and Protected Buildings (Interest groups involved) 11. Cooperative Boards (Decision-makers within apartment associations) 12. Commercial Banks (Provide loans; two bank refusals needed for KredEx loan) 13. County Development Centers (MAKs) (Provide counseling services)
<p>Timeline Please include:</p> <ul style="list-style-type: none"> • Timeline and duration • Milestones, reviews, amendments planned 	<p>Timeline and duration The operating years for the action are 2022-2027. The action budget for a concrete year is decided on a yearly basis, there is no predetermined distribution for the entire period. For 2023, 80 million euros was distributed, for 2024, 160 euros are planned and for 2025, 90 million euros. The sums for 2026 and 2027 are not decided yet</p> <p>Milestones³⁵</p> <p>Introduction of Regional Fund Distribution (2020): The program tested a regional distribution of funds in 2020, which was implemented to prevent faster regions from consuming funds allocated for slower regions.</p> <p>Construction Completion and Reporting (2026-2028): All buildings should be completed by 2026 to allow one year of monitoring for energy savings to be reported in 2028.</p> <p>Amendments planned</p> <p>Technical Requirements Update: As part of the European New Bauhaus initiative for inclusion, there have been updates to technical requirements under the support's technical conditions. These updates include mandates for accessibility features like ramps, handrails, appropriate lighting, and specifications for door thresholds.</p>

³⁵ Specific information about milestones and amendments can be obtained through Estonian State Shared Service Center (*Riigi tugiteenuste keskus*). Available at: <https://www.rtk.ee/en/funds-and-programmes/implementation>

<p>Scope and development Please include:</p> <ul style="list-style-type: none"> • Activities included • Planned developments, phases, repetitions or other • Project continuation in the future 	<p>Activities included: Funding of renovation and reconstruction of residential buildings.</p> <p>Planned developments, phases, repetitions or other The programme does only one thing – provides funding and related assistance to renovate apartment buildings. Support will also be awarded to private apartment houses. This support can also be provided for specific purposes, for instance single activities of the replacement of gas, stove or electric heating devices of apartment buildings that use renewable energy sources.</p> <p>Project continuation in the future The interviewees’ speculated on this topic as follows. Continuation of the project depends on funding. Currently, the funding comes from EU structural funds. But the future is not known for certain. Uncertain funding is the major challenge with the project.</p>
<p>Internal governance Please include:</p> <ul style="list-style-type: none"> • Legal basis • Bodies/units responsible for management, implementation, monitoring • Organigram (please attach if available) • Persons working on the action 	<p>Legal basis: Conditions for Energy Efficiency Grants for Apartment Buildings</p> <p>Bodies/units responsible for management, implementation, monitoring</p> <ul style="list-style-type: none"> • The implementing agency is the Estonian Business and Innovation Agency, under the trademark Kredex. • The managing authority is the Ministry of Climate. <p>Persons working on the action The draft and explanatory memorandum were prepared by the Ministry of Climate.</p>
<p>External governance Please include:</p> <ul style="list-style-type: none"> • Reporting obligations • Accountability • Partnerships • Collaborations 	<p>Reporting obligations Reporting Energy Savings: KredEx, as the implementing agency, has a reporting obligation related to demonstrating energy savings achieved through the program. This involves reporting the energy savings in gigawatt-hours or megawatt-hours. They use energy labels to show the energy savings before and after reconstruction projects. The post-reconstruction energy label can only be finalized after a year of completion to collect a year's worth of data. This is required to report and demonstrate the energy savings to the European Commission.</p> <p>Some formal sources for reporting are the following: <i>Kortere lamute energiatõhususe toetuse tingimused</i> stipulate in article 33 (1) that the beneficiary shall submit a final report on the implementation of the project to the implementing entity in accordance with the decision to grant the application, together with the application for the final payment.³⁶</p>

³⁶ Article 33 (2) provides elements which the report needs to contain: The final report of the project must include at least:

	<p>General conditions for the allocation and use of funds under the operational programmes of the Cohesion and Internal Security Policy Funds of the European Union for the period 2021–2027 stipulate the reporting obligation in article 10 (1) para 3. Support recipients are to provide accurate and complete information, correct documentation and reports on the implementation and impacts of the project by the deadline and in the required manner, including during monitoring and evaluations.</p> <p>Submission of Reports: Reports need to be submitted to multiple entities, including the Ministry of Climate, the Ministry of Finance, and the State Support Services Center. These three institutions are the primary bodies to which KredEx reports.</p> <p>Documentation of Recipient Buildings: All buildings that receive support are listed as public information on the RTK website, indicating another layer of accountability and transparency in the flow of funds.</p> <p>Equal Treatment and Competition: As public funds are involved, there are audit checks focusing heavily on how procurements are conducted, ensuring equal treatment of companies.</p> <p>Accountability The accountability measures mentioned by the interviewees include:</p> <p>Reporting Obligations. There is reporting obligation concerning energy savings. The program needs to achieve a certain amount of energy savings, and this is measured using energy labels before and after reconstruction.</p> <p>Audit and Oversight. The Ministry of Finance, the Ministry of Climate, and the State Support Services Center are mentioned as authorities responsible for auditing and overseeing the use of funds to ensure everything stays up to standard.</p> <p>Public Procurement. Public money requires that tenders must be organized as public procurements to ensure competition and equal treatment. This aspect is heavily audited to ensure compliance.</p> <p>Complaint Mechanism. There is a dispute procedure in place as outlined in the official support regulation, allowing for contesting decisions through administrative procedures.</p> <p>Compliance with Legal Norms. There is the legal obligation to give deadlines to rectify application deficiencies as part of the administrative process, ensuring procedural fairness.</p> <p>Feedback and Coordination Process. There is a formal coordination process for revising support measures,</p>
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- 1) the beneficiary's assessment of the effectiveness and implementation of the project and the contribution to the promotion of the principles set out in clauses 19 and 20 of § 21 and the promotion of horizontal principles related to the basic principles and objectives of EE2035;
 - 2) the beneficiary's confirmation of the accuracy of the data and the date of submission of the report.
 - (3) As a follow-up report, the beneficiary is required to submit an energy performance certificate based on measured energy use data for the calendar year following the implementation of the project in the manner established by the implementing entity no later than one month after the end of the relevant calendar year.

	<p>allowing for stakeholder input and requiring responses to each proposal, which seems to be an accountability measure for program design and implementation.</p> <p>Partnerships There are various partnerships involving public and private entities, From the public sector are involved: Ministry of Climate: The policy-making body responsible for creating support measures related to residential buildings. Ministry of Finance: The main responsible body for distributing European Union funds related to the program. State Support Services Center: Oversees the use of funds and audits KredEx's activities. Taltech (Tallinn Technical University): The university conducts various studies connected to the program, Ministries of Culture and Social Affairs: Mentioned as entities potentially involved in the coordination round for program regulation. From the private sector are engaged: Union of Housing Associations: An umbrella organization with constant cooperation regarding the program. Construction Entrepreneurs Union: Potentially involved in the coordination and feedback process. Local Development Centers: Provide consultation services. Technical Consultants: Act as intermediaries between apartment associations and the program, guiding them through technical and application processes.</p> <p>Collaborations Ministry of Climate: The policymaker responsible for specific measures and the main authority overseeing the program. Ministry of Finance: The main responsible body for European Union funds, distributing them among the ministries and overseeing financial management. State Support Services Center: Oversees the use of funds and conducts audits to ensure everything is up to standard. Union of Housing Associations: An umbrella organization with ongoing cooperation with the program for housing associations. European Union and its Structural Funds: The source of funding for the program. Local Development Centers: Provide counseling and are referenced as support points for people without internet access.</p>
<p>Funds Please include:</p> <ul style="list-style-type: none"> • Budget available for the action • Funding sources, (including administrative level) • Information on fundamental rights conditionalities if any 	<p>Budget available for the action The total budget is 330 million euros.</p> <p>The funding sources for the reconstruction and renovation program in Estonia primarily come from European Union structural funds and CO2 quota sales revenue. Very little funding comes directly from the Estonian state budget. The implementation of the program involves coordination between various administrative levels, including the Ministry of Finance,</p>

	<p>the Ministry of Climate, and the State Support Services Center, which oversee the use of the funds and audit activities to ensure compliance with standards.</p> <p>There are no explicit provisions on fundamental rights conditionalities within the reconstruction program. However, certain aspects imply an underlying consideration of social and economic rights as part of the program's broader goals, such as improving living conditions and addressing energy poverty through apartment renovations.</p> <p>Additionally, the focus on accessibility requirements, like installing ramps and handrails, aligns with considerations for accommodating persons with disabilities, indirectly touching on rights to accessibility and inclusion.</p>
Other aspects to be considered	N/A