

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

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1. EXECUTIVE SUMMARY

In order to achieve global climate targets through energy efficiency, French authorities have developed a comprehensive action within the framework of the National Energy and Climate Plan drawn up in consultation with the institutions of the European Union.

This action covers technical measures to ensure that environmental regulations lead to a minimum rate of renewable heat in all new buildings (houses, apartment buildings and service sector) as soon as they are implemented. This action also covers financial measures. For instance, the MaPrimeRénov' programme, represents core efforts in the French energy transition strategy, aimed at increased energy efficiency and reducing energy poverty.

This programme, MaPrimeRénov', is a direct financial aid aimed to finance work improving the energy performance of households. More precisely, it aims to finance insulation, heating, ventilation or energy audit work on an individual house or apartment building basis. Launched on 1 January 2020, MaPrimeRénov' assistance replaces the tax credit for energy transition (*Crédit d'Impôt pour la Transition Énergétique* - CITE). The CITE was an income tax credit on housing energy efficiency expenditures and on some renewable energy investments. The CITE was designed to support the government's goals regarding energy efficiency and greenhouse gas emissions.¹

The present research, focused on MaPrimeRénov' programme, is conducted through desk research and interviews. The major topics covered are the following: objectives, context, target groups, eligibility, impact accessibility, stakeholder engagement and participation, governance, accountability. This research outlines the programme's main accomplishments and persistent limitations in France. The views and perceptions of the interviewees align with each other and the results of the desk research in several points, while the interview findings further clarify from a technical point of view the practical challenges.

MaPrimeRénov' was created with a focus on providing targeted support for low- and very low-income individuals. The aid is targeted at home owners and access is means-tested. In this regard, the aim has been achieved: low-income households are now in practice the main beneficiaries of MaPrimeRénov' aid. A limitation lies in the programme's focus on homeowners, which in practice excludes a large portion of

¹ France, Ministry of Economy (*Ministère de l'économie*)(2024), « CITE-Tax credit for energy transition » ("*Le CITE, crédit d'impôt transition énergétique*"). For more information, see the webpage on [MaPrimeRenov'](#).

energy-poor households who are renters. This exclusion, though, is limited since this specific public has access to other energy-saving subsidies (prime Energy Saving Certificates – CEE, Energy Check, reduced VAT, etc.).

Since the programme's creation, progress has been made in terms of accessibility. In particular, the creation in January 2022 of a large public energy renovation service based on a network of institutions (the public service France Rénov' and the associations that are the departmental housing information agencies (*agences départementales pour l'information sur le logement - ADIL*) has been regarded as a major success in reaching households that otherwise might not afford energy renovation work. To better support low-income households, a specific course ("*Mon Accompagnateur Rénov'*" / "My Renovation Assistant") has been created providing personalised support throughout the entire procedure.

In practice however, several difficulties have been reported with relation to the accessibility to the MaPrimeRénov' aid. Access difficulties may be encountered due to the excessive complexity of the procedure which involves technical factors: knowledge of how the aid is structured; knowledge of energy performance diagnosis (DPE), that is to say the indicator which provides information on a home's energy and climate performance; knowledge of how to obtain planning permission; ability to contract the right company for the right work, etc. Complexity also results from the regulatory framework's instability. The programme has changed considerably since its inception due to reorientations in the governance of political action and a budget which varies accordingly. The instability of this aid, in addition to the existence of other aids available, create uncertainties or a deterrent effect for some persons.

Furthermore, the implementation of the MaPrimeRénov' programme has encountered certain obstacles such as: long processing times for aid requests to be granted; long delays in payment of aid when applications have been accepted; insufficient quality of the work carried out. These factors have influenced MaPrimeRénov' social acceptability.

In addition, vulnerable people are exposed to eco-delinquency, that is to say canvassing of companies to carry out work which, in practice, does not always meet the expected quality standards. Complaints for fraudulent practices have surfaced, indicating a need for better protection of these persons to ensure that they can benefit from quality renovation work.

Another issue related to MaPrimeRénov' aid raised by the interviewees involves regional disparities. Difficulty to access the procedure is due to the lack of availability of renovation companies in some regions. In consequence, support to some households is more difficult to put in place in practice. This regional factor can therefore increase the

difficulties in ensuring the access of low-income households in rural areas to MaPrimeRénov' assistance.

The interviewees also emphasised the necessity of new developments concerning energy efficiency. The number of global renovations carried out does not make it possible to achieve the objectives set within the framework of the energy transition (71,613 global renovations completed in 2023, while the objective was 90,000).² For 2024, this objective has been raised by the Minister of Ecological Transition to the completion of 200,000 global renovations.³ In addition, the contribution of the MaPrimeRénov' programme to the green transition remains difficult to assess precisely. The impact of energy renovation on reducing greenhouse gas emissions and energy consumption is calculated, but primarily through theoretical models. Efforts are being pursued in order to calculate the actual energy savings.

As an overall assessment, the challenge involves ensuring the programme's global coherence in practice: between national and local action, between "short-term" and "long-term" consultation, between the transversal approach to beneficiaries and an approach aimed at certain more vulnerable target groups (older people, people with disabilities or poorly educated people), between global or partial renovation ("*par geste*"). Progress has been reported in all of these aspects, but efforts need to be intensified in order to achieve the stated aims and to improve the situation of the most vulnerable households. From this perspective, the limits of the MaPrimeRénov' system seem symptomatic of the limits of public action: from a purely statistical point of view, the number of all renovations carried out confirms that the stated aims have not yet been achieved.

² France, National Housing Agency (*Agence nationale de l'habitat - ANAH*)(2024), "Key figures from ANAH - 2023 edition" ("*Les chiffres clés de l'ANAH*").

³ France, National Housing Agency (*Agence nationale de l'habitat - ANAH*)(2024), "Christophe Béchu: 'A fundamental dynamic has been established in favor of housing renovation'" (« *Christophe Béchu : "Une dynamique de fond s'est installée en faveur de la rénovation de l'habitat"* »), Janvier 2024.

2. Reaching climate targets through energy efficiency

The first French National Energy and Climate Plan was adopted in 2020,⁴ outlining the national target to achieve carbon neutrality by 2050 and to end energy poverty in ten years. After the assessment through the Commission,⁵ the revised plan was drawn up in November 2023⁶ and published in June 2024⁷ with new national targets for energy efficiency. For example, by 2030, France is aiming for a 96% decarbonized electricity mix with 61% nuclear and 35% renewable energies, emphasizing the “deployment of decarbonized energies”. To achieve these goals related to ecological transition, several energy efficiency measures have been taken by the French government. Their application, however, raises difficulties and questions that can be addressed essentially from three perspectives: economic, political and social.

At the Prime Minister's request, a dozen reports have been produced by the government department France Strategy (*France Stratégie*) on the economic impact of the ecological transition.⁸ A summary report based on these findings shows that achieving climate neutrality requires a major transformation comparable to the industrial revolutions of the past. Specifically, this transformation is based on three economic mechanisms: redirecting technical progress towards green technologies, sobriety - defined as the reduction of energy consumption that does not result from gains in energy efficiency, and substitution of capital for fossil fuels. Over the next years, decarbonisation will require substantial additional investment (more than two points of GDP in 2030, compared to a scenario without climate action).⁹

According to the summary report produced by *France Stratégie*, the transition produces unequal consequences on the situation of individuals and households. Even for the middle classes, renovating the home and changing the heating system, on the one hand, and acquiring an electric vehicle instead of a combustion-powered one, on the other,

⁴ France, Integrated national energy and climate plan for France (*Plan national intégré en matière d'énergie et de climat*), 2020.

⁵ European Commission (2020), "Assessment of the final version of France's national energy and climate plan" (*Évaluation de la version définitive du plan national en matière d'énergie et de climat de la France*), SWD(2020) 909 draft, 14 October 2020.

⁶ France, *Draft updated INECP*, November 2023.

⁷ France, *Integrated National Energy-Climate Plan of France – updated*, June 2024.

⁸ France, France Strategy (*France Stratégie*)(2023), The economic impact of climate action ("*Les incidences économiques de l'action pour le climat*"), May 2023.

⁹ France, France Strategy (*France Stratégie*)(2023), The economic impact of climate action ("*Les incidences économiques de l'action pour le climat*"), May 2023.

require an investment of about a year's income. Even if the investment is profitable, it cannot necessarily be financed without public support.¹⁰ To support households and businesses, public finances will be called upon to make a substantial contribution to the effort. Taking into account both new expenditure and the temporary reduction in revenue due to slower growth, the risk to public debt is about 10 points of GDP in 2030, 15 points in 2035, and 25 points in 2040, assuming that the reduction in revenue from energy is offset.¹¹ As a consequence, the energy efficiency measures will have to be addressed from an economic, political and social point of view.

2.1. Energy efficiency

In France, many varied measures have been implemented to reduce greenhouse gas emissions and promote sustainable energy use. Some of these may be mentioned here in particular, in view of their relevance to the study.

2.1.1. Measures specific to the residential/ service sector

The Integrated National Energy and Climate Plan (INECP) adopted in 2020 and updated in 2024 stipulates that environmental regulations for new buildings will set an innovative environmental standard for new buildings, combining requirements for reducing energy consumption, developing renewable energies, and taking greenhouse gas emissions into account over the building's entire life cycle (from its construction, throughout its operation, to its demolition). France is thus committing the construction industry to building positive-energy (which means buildings that produce more energy than they need to function), low-carbon buildings.¹²

For the residential sector in particular, energy efficiency initiatives contribute to meeting climate change mitigation targets and promoting sustainable energy use in a number of ways: by guiding the changes in the energy mix in the phase of use in existing and new buildings towards totally carbon-free energy consumption; by encouraging the renovation of all existing residential and service sector buildings in order to achieve an average equivalent Low Consumption Building (LCB) level for the entire stock; by increasing the energy and carbon performance levels of new buildings in future

¹⁰ France, France Strategy (*France Stratégie*)(2023), The economic impact of climate action ("[Les incidences économiques de l'action pour le climat](#)"), May 2023.

¹¹ France, France Strategy (*France Stratégie*)(2023), The economic impact of climate action ("[Les incidences économiques de l'action pour le climat](#)"), May 2023.

¹² France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024, p. 137.

environmental regulations; by aiming for greater energy efficiency in equipment and sober use.¹³

2.1.2. Measures to develop renewable heat:

Technical measures:

- Ensure that environmental regulations on new buildings lead to a minimum rate of renewable heat in all new buildings (houses, apartment buildings and service sector) as soon as they are implemented. France has launched a project called “Environmental Regulations 2020 (RE2020)” to take into account regulations not only in energy consumption, but also carbon emissions. The challenge is to design and build future living spaces by pursuing three major goals: a goal of energy sobriety and decarbonization of energy; reduction in carbon impact; ensuring of comfort in the event of high temperatures;¹⁴
- Make it easier to classify efficient district heating and cooling systems (the classification of a district heating or cooling system is a procedure used to define areas within which any new installation has to be connected to the system).¹⁵

Financial measures:

- Make ‘MaPrimeRénov’, a subsidy for private individuals to finance energy renovation projects, more effective by setting a flat-rate amount differentiated according to technologies and taking into account, in particular, the production of renewable heat by each type of equipment;¹⁶
- Maintain the 5.5% VAT rate for renewable heating equipment eligible for the French tax credit for energy transition (CITE), and related work (e.g. flue, pellet silo);¹⁷
- Better coordination of Heat Fund (*Fonds Chaleur*) and Energy Savings Certificates (*Certificats d’Économie d’Énergie* - CEE)¹⁸ grants, in line with European Community guidelines.¹⁹

2.1.3. Carbon pricing

In 2014, a proportional share of CO₂ emissions from energy products was introduced within domestic consumption taxes on energy products (*taxes intérieures de consommation sur les produits énergétiques* - TICPE). France Stratégie, a department of

¹³ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

¹⁴ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

¹⁵ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

¹⁶ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

¹⁷ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

¹⁸ Requiring energy suppliers to finance a certain volume of energy renovation work in French households, some of which is carried out by households in energy poverty.

¹⁹ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

the French Prime Minister, is currently updating the trajectory of the shadow price of carbon. The shadow price of carbon represents the value to the community of the efforts required to avoid the emission of one metric ton of CO₂ equivalent. It is intended to be used in the design and assessment of various measures to encourage private investment and low-carbon behaviour (explicit carbon pricing, investment subsidies, regulations, etc.), without aiming to set the level and rate instrument by instrument. The shadow price of carbon provides a benchmark against which to compare the cost of these public policies per metric ton of greenhouse gas avoided, which is one of the factors to be taken into account when designing measures.²⁰

Carbon pricing is used in the socio-economic assessment of public investment projects, to guide choices towards projects that promote decarbonisation.²¹

2.1.4. Policies and measures to promote low-carbon mobility

The clean mobility development strategy (*Stratégie de développement de la mobilité propre* - CMDS) is an annex to the multi-year energy plan (*programmation pluriannuelle de l'énergie* - PPE). It takes place against the backdrop of the mobility orientation law (*loi d'orientation des mobilités*), adopted on 19 November 2019, which radically reforms the general framework of mobility policies. The main orientations and courses of action of the clean mobility development strategy (SDMP) are as follows:²²

- Enable all regions to benefit from alternative mobility services to the individual use of the car, and unleash innovation;
- Control demand for mobility;
- Develop low-emission vehicles (including river, sea and air) and improve the energy efficiency of the fleet by leveraging the alternative fuels market;
- Encourage modal shift for passenger transport.²³

For the transport sector, energy efficiency initiatives contribute to achieving these targets in several ways: by giving the sector incentive price signals; by setting clear targets that are consistent with the targets set for the energy transition of stocks; by supporting fleet development for all modes of transport; by supporting local authorities and businesses in taking innovative initiatives; by encouraging modal shift by supporting active mobility and high-volume, public transport (freight and passengers) and developing intermodality; by controlling the rise in demand for transport.²⁴

²⁰ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

²¹ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

²² France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

²³ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

²⁴ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

2.2. Just transition

2.2.1. Overview of the concepts of the "just transition" and "leave no one behind"

A just transition framework is necessary to mitigate potential negative impacts and enable regions and individuals to cope with the social, economic and environmental consequences of the ecological transition. The French government recognises the importance of reducing the negative effects of specific actions on the affected communities. For instance, in the most vulnerable areas, where the ecological transition will increase structural vulnerabilities, active inclusion measures for jobseekers are envisaged. In addition, several financial support mechanisms have been put in place to facilitate the accessibility of the transition for all, including the MaPrimeRénov' program.

The "just transition" concept has been explicitly included in the National energy and climate plan (*Plan national en matière d'énergie et de climat*). The INECP examines aspects related to a "just transition" and provides information on the social, employment and skills impacts of a transition to a climate-neutral economy.²⁵ It presents a series of instruments designed to reduce energy poverty, such as the energy voucher and specific measures relating to energy transition tax credits, energy saving certificates and financial and technical support for home renovation and mobility. In line with the goals of the Energy Union, it therefore aims to ensure energy security for citizens.²⁶

The 2024 INECP includes these measures and adds that the large-scale deployment of innovative technologies also calls for anticipating the need to tailor training and the availability of manpower. The issue of skills is fundamental to ensuring a "just and effective transition". Significant resources will be made available to develop training opportunities for transition-related professions.²⁷ The "Leave no one behind" (*Ne laisser personne de côté*) concept has been explicitly included in the National energy and climate plan (*Plan national en matière d'énergie et de climat*). It is referred to in the explanatory memorandum to law No. 2021-1104 of 22 August 2021 on combating climate change and building resilience to its effects,²⁸ which is one of the laws implementing the INECP. This introductory text points out that the law is the result of a participatory process in the form of a "Citizens' climate convention" (*Convention*

²⁵ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

²⁶ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024.

²⁷ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024, p. 296.

²⁸ France, Law No. 2021-1104 on combating climate change and building resilience to its effects, Explanatory memorandum, ([Loi n° 2021-1104 portant lute contre le dérèglement climatique et renforcement de la resilience face à ses effets, Exposé des motifs](#)), 22 August 2021.

Citoyenne pour le climat), a citizens' assembly set up in October 2019 at the request of the Prime Minister. It links the concept to the aim of "social justice", through the provision of "support for all, especially the most vulnerable". In line with the goals of the Energy Union, it aims to ensure energy security for citizens.

2.2.2. Legal and policy framework

Given that housing accounts for one-fifth of France's greenhouse gas emissions, a series of measures have been taken to help people on the lowest incomes make the transition to thermal renovation. The law No. 2019-1147 of 8 November 2019 relating to energy and climate²⁹ takes the INECP into account. Its aim is to renovate all "homes that leak heat" (*passoires thermiques*) within ten years. The law prohibits the owner of a property considered to be leaking heat from increasing the rent between two lettings without having renovated it, starting in 2021. Landlords can ask tenants to make a financial contribution if, and only if, the work will prevent heat from leaking from their home. When a property considered to be leaking heat is put up for sale or rent, energy performance diagnostics must be supplemented by an energy audit.³⁰ The law thus provides better access to information: purchasers or tenants must be informed of the future energy costs they will incur (via the deed of sale or lease, or the property advertisement, for example).

Adapting employment to the ecological transition: the law No. 2021-1104 of 22 August 2021 amends the Labour Code to adjust employment to the ecological transition and refers to the INECP.³¹ It changes the remit of the Social and economic committee (*Comité social et économique*), whose task is to ensure that the collective voice of employees is heard, to allow their interests to be constantly taken into account in decisions regarding the company's management and economic and financial development, work organisation, vocational training and production techniques. It stipulates that it must henceforth carry out this task "*in particular with regard to the environmental consequences of these decisions*".³² To this end, this law created an economic, social and environmental database (Bdese), bringing together all the information required for consultations and recurring information that the employer makes available to the social and economic committee (*comité social et*

²⁹ France, Law No. 2019-1147 relating to energy and climate ([Loi n° 2019-1147 relative à l'énergie et au climat](#)), 8 November 2019.

³⁰ France, Law No. 2022-1158 on emergency measures to protect purchasing power ([Loi n° 2022-1158 portant mesures d'urgence pour la protection du pouvoir d'achat](#)), 16 August 2022.

³¹ France, Law No. 2021-1104 on combating climate change and building resilience to its effects, Explanatory memorandum, ([Loi n° 2021-1104 portant lute contre le dérèglement climatique et renforcement de la resilience face à ses effets, Exposé des motifs](#)), 22 August 2021.

³² France, Labour Code (*Code du travail*), Article L. 2312-8.

économique).³³ Among the environmental indicators to be included in the economic, social and environmental database is gender equality at work.³⁴

2.3. Energy poverty

2.3.1. Developments in addressing energy poverty

In France there is a legal definition for energy poverty, which is the basis for political measures with the aim of providing concrete financial support to precarious populations. In addition, this concept is used by various analyses, studies and data on the topic of energy poverty.

The so-called Grenelle 2 Act of 10 July 2010 provides a legal definition of energy poverty: "Anyone who experiences particular difficulties in obtaining the energy supply needed to meet their basic needs in their home, due to the unsuitability of their resources or housing conditions is in a situation of energy poverty [...]".³⁵ In addition, the 2015 law on the energy transition for green growth (*loi relative à transition énergétique pour la croissance verte* - LTECV) specifies in Article 30 that "a household is considered to be in a situation of energy poverty when its reference tax income is, taking the household composition into account, below an upper limit set by order of the minister responsible for energy" (JORF 2015).³⁶

While France has no legislative definition of transport poverty, the National observatory on energy poverty (ONPE, which is a national institution for observing energy poverty in France) stipulated that a household can be considered to be in "mobility" energy poverty when it is one of the poorest 30% of French households, and spends more than 4.5% of

³³ France, Labour Code (*Code du travail*), Articles L. 2312-8 and L. 2312-36.

³⁴ France, Decree No. 2022-678 on environmental indicators to be included in the economic, social and environmental database (BDESE) and on economic, social, environmental and trade union training (*Décret n° 2022-678 relatif aux indicateurs environnementaux devant figurer dans la base de données économiques, sociales et environnementales (BDESE) et aux formations économiques, sociales, environnementales et syndicales*), 26 April 2022.

³⁵ France, Law No. 2010-788 regarding national commitment to the environment No. 2010-788 (*Loi n° 2010-788 portant engagement national pour l'environnement*), 12 July 2010 ; France, Law No. 2014-366 for access to housing and renovated urban planning (*Loi n° 2014-366 pour l'accès au logement et un urbanisme rénové*), 24 March 2014.

³⁶ France, Law No. 2015-992 on energy transition for green growth (*Loi n° 2015-992 relative à la transition énergétique pour la croissance verte*), 17 August 2015.

its resources on fuel (to get to work and/or school, as well as for shopping, health or administrative purposes).³⁷

These concepts have been the basis for the adoption of several measures. The INECP includes measures to support the most vulnerable households exposed to precariousness. These are of several types.³⁸

The INECP begins with **preventive measures**:

- Support for energy renovation: a number of schemes aim to prevent energy poverty, with a particular focus on low-income households. For example, MaPrimeRénov' grants are subsidies for private individuals to finance energy renovation projects; tools such as the "zero-rate eco-loan" (*éco-prêt à taux zéro*) and the "renovation advance loan" (*Prêt avance rénovation*) help to finance the out-of-pocket expenses borne by households and facilitate their access to bank loans.³⁹

- Introduction of tariff shields to protect households from energy price rises, such as limiting the increase in regulated electricity sales tariffs in February 2022, then limiting the increase to 15% in February 2023 and a further 10% in August 2023, lowering the excise duty on electricity to its minimum authorised level, and aid for apartment buildings.⁴⁰

It also includes **remedial measures**, in particular bill payment assistance: the energy voucher. Brought into widespread use in 2018, the energy voucher is a government scheme intended for low-income households to help them pay their energy bills, regardless of the heating method (including electricity, gas, wood, fuel oil and LPG) or energy renovation work. State aid earmarked for household energy expenditure is the tool that helps to mitigate the cost of the transition for low-income households, and is an essential aspect in ensuring a just transition. Based on household income and composition (all persons living under the same roof), it is granted on the basis of reference tax income per consumption unit (*revenu fiscal de référence pour unité de consommation - RFR/UC*). Households do not need to take any steps to obtain it, as it is sent to them automatically based on data held by the tax authorities. In 2022, 5.8 million households benefited from the energy voucher, for an amount ranging from €48 to €277. 82.6% of households used it.⁴¹

³⁷ France, National observatory on energy poverty (*Observatoire nationale de la précarité énergétique*)(2021), "What is transport-related poverty and how can cities help?" ("*Qu'est-ce que la précarité liée aux transports et comment les villes peuvent-elles y remédier ?*"), 6 October 2021.

³⁸ France, *Integrated National Energy-Climate Plan of France – updated*, June 2024, p. 117.

³⁹ France, *Integrated National Energy-Climate Plan of France – updated*, June 2024, pp. 117-118.

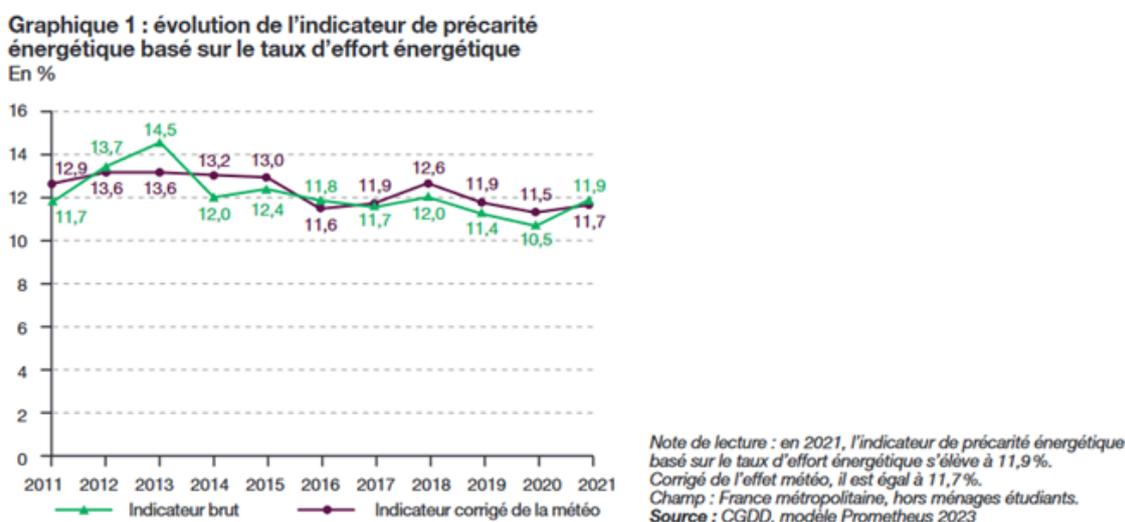
⁴⁰ France, *Integrated National Energy-Climate Plan of France – updated*, June 2024, pp. 117-118.

⁴¹ France, *Integrated national energy and climate plan for France (Plan national intégré en matière d'énergie et de climat)*, Draft update, 2023, pp. 84-85.

2.3.2. Effectiveness and groups concerned

Several analyses have been carried out in France on the topic of energy poverty. According to the French national observatory on energy poverty (*Observatoire national de la précarité énergétique* - ONPE), in 2021, 11.9% of French households, i.e. 3.4 million households (compared with 3 million in 2020), spent more than 8% of their income to pay their housing energy bill (compared with 10.5% in 2020 and 11.4% in 2019). Over the past few years, the effort rate has changed as follows:⁴²

Graphic 1. Evolution of the energy poverty indicator based on the energy effort rate in %



Reading note: in 2021, the energy poverty indicator based on the energy effort rate was 11.9%. Adjusted for weather effects, it stands at 11.7%.

Scope: Metropolitan France, excluding student households.

Source: CGDD, model 2023 Prometheus

These data reveal a persistence of the phenomenon of energy insecurity over the years. Inequalities in living standards increased sharply after the economic crisis of 2008, which mainly affected the poorest. After a decline, inequalities were stabilized until 2017

⁴² France, *Integrated National Energy-Climate Plan of France – updated*, June 2024, p. 116 ; France, National observatory on energy poverty (*Observatoire nationale de la précarité énergétique*)(2023), “Energy poverty Dashboard” (“[Tableau de bord de la précarité énergétique](#)”).

before increasing in 2018 with taxation favourable to the financial income of the wealthiest households. Inequalities in living standards decreased in 2019 due to an improvement in the labour market and tax reforms that further favour middle-income and low-income households. This decline in inequalities continued in 2020 due to measures to support earned income during the health crisis. The proportion of people experiencing material and social deprivation increased in 2022. It reached its highest level in 2023. This increase can be explained by inflation which contributes to eroding the purchasing power of households.

According to the barometer of everyday mobility (*baromètre des mobilités du quotidien*), 13.3 million French people are in a transport poverty⁴³ situation.⁴⁴ These people fall into two categories. First of all, 9 million people are affected by mobility insecurity. These people may be affected by one or more of the "transport poverty" factors measured by the Barometer. Of these 9 million people, according to the Baromètre:

- 3.6 million of them are affected by fuel poverty: these are people with low incomes, high fuel costs and/or who already have to restrict their travel.⁴⁵
- In particular, 4.3 million people are affected by mobility vulnerability. This is characteristic of low-income households with restrictive mobility conditions, such as long distances to cover, no alternative to the car or ageing vehicles.⁴⁶
- In particular, 5.3 million French people are car-dependent. This factor is much broader than personal economic circumstances. It concerns all motorists who have high fuel costs, and restrictive mobility conditions such as long distances, or who have no other choice than the car.⁴⁷
- 2.5 million French people combine two or three of these insecurity factors.⁴⁸

According to the barometers of the National energy ombudsman (*Médiateur national de l'énergie*), 31% of consumers and 55% of 18-34 year-olds have had difficulty paying certain gas or electricity bills (compared with 18% in 2020). According to the National energy ombudsman (*Médiateur national de l'énergie*), the population most at risk are

⁴³ According to the National observatory on energy poverty a household can be considered to be in "transport" energy poverty when it is one of the poorest 30% of French households, and spends more than 4.5% of its resources on fuel (to get to work and/or school, as well as for shopping, health or administrative purposes). France, National observatory on energy poverty (*Observatoire nationale de la précarité énergétique*)(2021), "What is transport-related poverty and how can cities help?" ("*Qu'est-ce que la précarité liée aux transports et comment les villes peuvent-elles y remédier ?*"), 6 October 2021.

⁴⁴ France, Barometer of everyday mobility (*Baromètre des mobilités du quotidien*) No. 2, March 2022.

⁴⁵ France, Barometer of everyday mobility (*Baromètre des mobilités du quotidien*) No. 2, March 2022.

⁴⁶ France, Barometer of everyday mobility (*Baromètre des mobilités du quotidien*) No. 2, March 2022.

⁴⁷ France, Barometer of everyday mobility (*Baromètre des mobilités du quotidien*) No. 2, March 2022.

⁴⁸ France, Barometer of everyday mobility (*Baromètre des mobilités du quotidien*) No. 2, March 2022.

single-parent families receiving minimum social benefits, over-indebted households and older people on low pensions.⁴⁹

According to the INECP, the Social Climate Fund (*Fonds social pour le climat* - FSC) created to mitigate social consequences of the creation of the new European carbon market on the road transport and building sectors aims to reduce the dependence on fossil fuels of the most vulnerable households exposed to energy poverty or in particular exposed very small businesses, while contributing to the aims of reducing greenhouse gas emissions in these sectors. France has begun work on its future Social climate plan (*Plan social climat*), which it has to submit to the Commission by June 2025 at the latest, in line with its updated National Energy Climate Plan (*Plan National Energie Climat*).⁵⁰

2.4. Fundamental rights impact assessment

In France, there is no specific assessment of the impact of energy efficiency measures on fundamental rights. Fundamental rights do not constitute reference standards for the authorities, as interviewees pointed out. Some policy documents contain social impact assessments. However, they are *ex ante* assessments, and the social aspects are relatively marginal with regard to economic ones. In addition, these policy documents do not always provide an in-depth impact assessment. One of the interviewees summarizes this orientation as follows:

“There is a social inspiration in the energy transition policy, precisely with these bonuses which vary according to the level of income, but it is not really the fundamental rights which are at the heart of the MaPrimeRénov’ system and the energy transition policy”. / “Il y a une inspiration sociale dans la politique de transition énergétique, justement avec ces primes qui varient en fonction du niveau de revenu, mais ce ne sont pas vraiment les droits fondamentaux qui sont au cœur du dispositif MaPrimeRénov’ et de la politique de transition énergétique”.

For example, the National Energy and Climate Plan (NECP) puts special emphasis on energy poverty and provides consistent information on policies and allocated resources. According to the European Commission, France has taken into account the just transition recommendation. Social impacts on households of proposed measures are well developed, especially in measures related to mobility and residential housing with a focus on energy poverty. However, according to the Commission, it would also be relevant to provide a distributional impact assessment on households’ income (including

⁴⁹ France, National energy ombudsman (*Médiateur national de l’énergie*)(2023), [ÉNERGIE-INFO barometer, 17th Edition](#), 17 October 2023.

⁵⁰ France, [Integrated National Energy-Climate Plan of France – updated](#), June 2024

impact on housing costs), notably in rural areas, of the planned transition measures.⁵¹ The Commission's 2023 recommendations on the just transition also highlight the need for France to identify in sufficient depth the social, employment and skills impacts of the climate and energy transition.⁵²

In terms of energy, the assessment of the economic, social and environmental impact of the multi-year energy plan (*programmation pluriannuelle de l'énergie* - PPE) is provided for by French legislation, specifically Article 176 of the 17 August 2015 law on the energy transition for green growth.⁵³ The 2022 impact study provides an assessment for the future and highlights the need to support households during the transition period, which will be achieved in particular via the various public aids concerning investments favourable to the energy transition of households.⁵⁴

In the climate change area, legislation stipulates that when the national low-carbon strategy (*Stratégie Nationale Bas-Carbone* - SNBC) is revised, the Government is required to publish a report, known as the strategy support report, no later than six months before the deadline for publication of the revised strategy.⁵⁵ The report details how the carbon budget and low-carbon strategy projects include national targets, as well as France's European and international commitments. The report assesses the environmental, social and economic impacts of carbon budgets for the coming periods and of the new low-carbon strategy. However, social aspects are only partial and marginal. Economic impacts tend to be treated in a more refined manner. The report is focused in particular on the competitiveness of economic activities subject to international competition, on the development of new local activities and on growth.⁵⁶

⁵¹ European Commission (2020), "[Assessment of the final version of France's national energy and climate plan](#)" (*Évaluation de la version définitive du plan national en matière d'énergie et de climat de la France*), SWD(2020) 909 draft, 14 October 2020.

⁵² European Commission, [Recommendation on the draft updated integrated national energy and climate plan of France covering the period 2021-2030 and on the consistency of France's measures with the Union's climate-neutrality objective and with ensuring progress on adaptation](#), C(2023) 9621 final, 18 December 2023.

⁵³ France, Law No. 2015-992 on the energy transition for green growth (*Loi no. 2015-992 relative à la transition énergétique*), 17 August 2015.

⁵⁴ France, Economic, social and environmental impact study of the multi-year energy plan (*Programmation pluriannuelle de l'énergie* - PPE).

⁵⁵ France, Environmental code (*Code de l'environnement*), [Article L.222-1 D](#).

⁵⁶ France, Ministry of Ecological and Inclusive transition (*Ministère de la transition écologique et solidaire*)(2020), Report on the National low-carbon strategy (*Stratégie nationale bas carbone* - SNBC), March 2020.

3. Addressing different aspects of energy efficiency and energy poverty: The selected project MaPrimeRénov'

The MaPrimeRénov' programme is linked to the overall climate targets and was selected for in-depth analysis because it is the main financial aid to support low-income households in their energy renovation initiatives. This programme is essential for the French energy transition strategy, aimed at increased energy efficiency and reducing energy poverty. It has been the subject of colossal promotion by public authorities but has also been the focus of criticism from different actors. Currently, the MaPrimeRénov' programme is the most representative of the initiatives taken by the French authorities in order to reach climate targets through energy efficiency as well as their limits.

Objectives and rationale

MaPrimeRénov' is a financial aid that aims to promote energy renovation work. It helps to finance insulation, heating, ventilation or energy audit work on an individual house or apartment building basis. Launched on 1 January 2020, MaPrimeRénov' assistance replaces the tax credit for energy transition (CITE). The CITE was an income tax credit on housing energy efficiency expenditures and on some renewable energy investments. The CITE was designed to support the government's goals regarding energy efficiency and greenhouse gas emissions.⁵⁷

Unlike the CITE, the MaPrimeRénov' aid is open to all owners irrespective of their income, but the financial amount provided to cover energy renovation work varies upon the income of households. Thus, this aid is intended to benefit mainly low-income households. More specifically, the amount of the incentive is differentiated according to household income and the type of work. All incomes of French households have been divided into several brackets, according to which the amounts of MaPrimeRénov' attributable differ. There are therefore four main income groups: very modest

⁵⁷ France, Ministry of Economy (*Ministère de l'économie*)(2024), « CITE-Tax credit for energy transition » (*"Le CITE, crédit d'impôt transition énergétique"*). For more information, see the webpage on [MaPrimeRenov'](#).

households, modest households, intermediate-income households, highest-income households.⁵⁸

The primary goal of MaPrimeRénov' is to allow individuals to apply for a direct financial subsidy before starting renovation works, with the intention of providing funds more quickly. According to an expert interviewed, the CITE programme contributed to growing inequalities, as it was predominantly used by the top three income deciles. MaPrimeRénov' was created with the aim of helping households with low income and ambitions to help France meet its carbon emission reduction and energy consumption goals, creating a positive collateral impact as part of a broader climate and energy policy. It can be a very advantageous financial aid. For example, MaPrimeRénov' can finance up to 90% of the cost of the work for an isolated renovation act.

Legal and policy context

The MaPrimeRénov' programme has undergone several developments. While it has been extensively promoted by the public authorities, MaPrimeRénov' has been the focus of criticism in the past both from public institutions such as the Defender of Rights or the Court of Auditors and from private associations working in the field of housing. This led the French government to make several changes. Interviewees also stressed that the MaPrimeRénov' programme is changing due to budgetary constraints, and it is currently in a transitional phase where enthusiasm for energy renovation will depend on political factors and the new government. The current period is somewhat uncertain and ambiguous due to ongoing political changes in France.

The most significant advancement has come with the creation of MaPrimeRénov' "*Parcours accompagné*" in 2024 by French authorities.⁵⁹ The goal of this new pillar is to simplify the renovation process and make it more straightforward for individuals. In response to reactions from energy renovation professionals, the State decided to stop funding only "by measure – *par geste*" isolated renovation acts, opting to fund comprehensive and "large-scale" renovations.

The creation of MaPrimeRénov' "*Parcours accompagné*" also came to address the need to mediation between households and state aid. One of the major limitations of MaPrimeRénov' aid was the identification of the households most in difficulty, and the support to these households from the beginning to the end of the work. The various national and local systems put in place by public authorities, by local authorities

⁵⁸ France, Fondation Abbé Pierre (2023), « The State of Poor Housing in France » ("*L'état du mal-logement en France 2023*"), p. 151.

⁵⁹ France, Ministry of Economy (Ministère de l'économie)(2024), MaPrimeRénov' Guided Path: Everything You Need to Know About This Aid ("*MaPrimeRénov' Parcours accompagné : tout savoir sur cette aide*"), July 2024.

(Municipal Social Action Center – CCAS,⁶⁰ etc.), by associations (Local Energy and Climate Agencies⁶¹– ALEC, etc.) had the greatest difficulties in reaching households experiencing extreme energy poverty.⁶² Several actors have worked for this change, such as SOLIHA (Solidarity for housing), which is a national associative network in the housing improvement sector and an approved operator of the National Housing Agency (*Agence nationale de l’habitat - ANAH*),⁶³ or Urbanis,⁶⁴ who are called the “historical operators” of the ANAH. This role of mediation between public aid and households, and of supporting households, has been institutionalised and has given rise to “*Mon Accompagnateur Rénov*” (MAR).⁶⁵

The Integrated national energy and climate plan for France (*Plan national intégré en matière d’énergie et de climat*) provides for this financial measure (MaPrimeRénov’) with the aim of boosting renewable heat production. MaPrimeRénov’ is financed by the French government on credits from the Ministry of Energy Transition. Its implementation is based on a total budget of €3 billion per year.⁶⁶ Its budget was increased in 2024 to reach €4 billion in total. Between 2021 and 2023, the European Union funded 70% of the MaPrimeRénov’ program as part of the recovery plan. This amounts to €1.404 billion for the energy renovation of 700,000 homes.⁶⁷

⁶⁰ France, Social aid (*Aide sociale*)(2024), “What is a CCAS? What are the missions of the Municipal Social Action Center?” (“*Qu’est qu’un CCAS ? Quelles sont les missions du Central Communal d’Action Sociale ?*”).

⁶¹ France, Prefect of the Brittany Region (*Préfet de la région Bretagne*)(2019), Local Energy and Climate Agencies (*Les Agences Locales de l’Energie et du Climat*).

⁶² France, Fondation Abbé Pierre (2023), « The State of Poor Housing in France » (“*L’état du mal-logement en France 2023*”), p. 151.

⁶³ France, Solidarity for housing (*Solidaire pour l’Habitat - SOLIHA*).

⁶⁴ For more information, see the web page of [Urbanis](#).

⁶⁵ France, National Housing Agency (*Agence nationale de l’habitat - ANAH*)(2023), « Become My Renovation Guide » (“*Devenir Mon Accompagnateur Rénov*”); France, National Housing Agency (*Agence nationale de l’habitat - ANAH*)(2024), My Renovation Guide: A Key Player in Renovation (“*Mon Accompagnateur Rénov’, un acteur clé de la rénovation*”).

⁶⁶ France, Integrated national energy and climate plan for France (*Plan national intégré en matière d’énergie et de climat*), 2020, p. 326; France, Government (*Gouvernement*)(2023), Report on the environmental impact of the State budget (*Rapport sur l’impact environnemental du budget de l’Etat*).

⁶⁷ France, General Secretariat for European Affairs (*Secrétariat général des affaires européennes*), « #NextgenerationEU: France Submits Its Second Payment Request » (“*#NextgenerationEU : la France dépose sa deuxième demande de paiement*”).

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

3.1.1. Targeted groups and applicable eligibility criteria

The MaPrimeRénov' programme is based on three pillars: "*Parcours par geste*", "*Parcours accompagné*", "*Co-propriété*".

MaPrimeRénov' "*Parcours par geste*"⁶⁸ designates the main financial aid for carrying out one or more insulation works, changing a decarbonized heating or a domestic hot water system. Most type of owners are eligible. This measure is all the more important since approximately 63 percent of people in France live in an owner-occupied home.⁶⁹ As default, social landlords, renters and legal entities are not eligible.⁷⁰

This financial aid is granted based on income, taking into account both the applicant's earnings and those of all individuals residing in the household. The level of aid provided is proportional to the applicant's income — the lower the income, the higher the aid. As one interviewee explained it, when someone submits a file to benefit from MaPrimeRénov' assistance, the reference of the tax income is required in order to classify the household into one of the categories: very modest, modest, intermediate and higher. The level of aid and the type of eligible aid differs depending on the classification. The interviewee summarised the logic of the programme as follows:

"The aid is proportional—the less income you have, the more significant the aid is." / "L'aide va être proportionnelle, c'est-à-dire que moins on a de revenus, plus l'aide est importante."

In order to benefit from MaPrimeRénov' assistance "*Parcours par geste*", the accommodation must be: occupied as a main residence for at least eight months per year; and built at least 15 years ago in mainland France or two years overseas. In case of a rent, the landlord must agree to rent their property as their main residence for a period of six years and within one year following the date of request for payment of the

⁶⁸ France, Ministry of Economy (*Ministère de l'économie*)(2024), « MaPrimeRénov': The Grant for Energy Renovation » ("*MaPrimeRénov': la prime pour la rénovation énergétique*"), June 2024.

⁶⁹ France, Statista Research Department (2024), "Distribution of the French population from 2008 to 2022, according to the occupation status of the main residence ", May 2024.

⁷⁰ France, Decree No. 2020-26 relating to the energy transition bonus (*Décret n° 2020-26 relatif à la prime de transition énergétique*), 14 January 2020.

balance of the premium.⁷¹ In addition to being an owner, there are some specific conditions that must be met: the company performing the work must be RGE-certified ("recognized environmental guarantor"), and the application must be submitted before the work begins.⁷²

MaPrimeRénov' "Parcours accompagné"⁷³ is the second pillar of the system. While the first part of MaPrimeRénov' makes it possible to finance small-scale work to install a more ecological heating system and to benefit from a fixed aid subject to resource conditions, MaPrimeRénov' "Parcours accompagné" helps carry out large-scale work with more substantial financing. It is available to owner occupants, lessor owners with middle and upper incomes from 1 January 2024 and all lessor owners from 1 July 2024.⁷⁴

In order to benefit from MaPrimeRénov' "Parcours accompagné" assistance, the accommodation must be: in mainland France occupied as a main residence (at least eight months per year) for a period of at least three years from the date of request for the balance of the assistance; a home built at least 15 years ago, regardless of its energy label. Landlords must solemnly swear to rent their property as their main residence for a period of at least six years and within one year following the request for the incentive.⁷⁵

MaPrimeRénov' "Co-propriété"⁷⁶ is the third pillar of the system. It is available if the co-ownership meets certain criteria: in order to be eligible, the co-ownership must own at least 75% of the lots (the percentage is reduced to 65% for co-ownerships of 20 lots or less) or failing that, shares dedicated to main residential use; it must have been built at least 15 years ago; it must have been registered and updated annually in the national register of co-ownerships.

There are no nationality criteria as a condition for eligibility, nor are there specific measures planned for different target groups. Middle-income and lower-middle-income

⁷¹ France, Ministry of Economy (*Ministère de l'économie*)(2024), « MaPrimeRénov': The Grant for Energy Renovation » ("*MaPrimeRénov': la prime pour la rénovation énergétique*"), June 2024.

⁷² France, Ministry of Economy (*Ministère de l'économie*)(2024), « MaPrimeRénov': The Grant for Energy Renovation » ("*MaPrimeRénov': la prime pour la rénovation énergétique*"), June 2024.

⁷³ France, Ministry of Economy (*Ministère de l'économie*)(2024), MaPrimeRénov' Guided Path: Everything You Need to Know About This Aid ("*MaPrimeRénov' Parcours accompagné : tout savoir sur cette aide*"), July 2024.

⁷⁴ France, Ministry of Economy (*Ministère de l'économie*)(2024), MaPrimeRénov' Guided Path: Everything You Need to Know About This Aid ("*MaPrimeRénov' Parcours accompagné : tout savoir sur cette aide*"), July 2024.

⁷⁵ France, Ministry of Economy (*Ministère de l'économie*)(2024), MaPrimeRénov' Guided Path: Everything You Need to Know About This Aid ("*MaPrimeRénov' Parcours accompagné : tout savoir sur cette aide*"), July 2024.

⁷⁶ France, Ministry of Economy (*Ministère de l'économie*)(2024), "MaPrimeRénov' Copropriété: Everything You Need to Know About This Aid for Renovating Common Areas in Your Condominium" ("*MaPrimeRénov' Copropriété: tout savoir sur cette aide pour rénover les parties communes de votre copropriété*"), April 2024.

households are currently the primary targets and beneficiaries of MaPrimeRénov' aid. According to two interviewees, there is an effort to encourage applications from the most energy-consuming properties, and incentives are offered. This mechanism can incentivise lower-income households, which is the goal of the public policy. Essentially, the less money you have, the more aid you receive. From this perspective, there might be some prioritisation, but not in the sense that between two applications, one is chosen over the other. If both are eligible, and both will be funded for the time being.

3.1.2. Measures taken

Various measures have been adopted in France to ensure the ecological transition in the respect of equality, inclusion and non-discrimination. They are in particular favourable to vulnerable people, such as older persons, persons with disabilities, persons with low education.

Public Energy Renovation Service, called “France Rénov’”:

France Rénov’,⁷⁷ the public service for home renovation, is the single point of entry for all work processes: it gives French people equal access to information, guides them throughout their renovation project, and also provides specific support for households with the lowest incomes. This network is organised regionally, with the assistance of local authorities, and in particular the Regions, and is structured in a complementary way with local housing improvement programs led by local authorities. The information and advice provided by France Rénov’ are neutral, free and personalised, in order to secure the renovation process, facilitate the deployment of financial aid and better direct households towards professionals.

With France Rénov’, households have several channels to prepare and secure their renovation project:

- A web platform (france-renov.gouv.fr) on which they can find useful information about home renovation, a simulation tool to identify the financial aid available for the energy renovation of their home, as well as a directory of qualified RGE craftsmen;
- A single national telephone number (0 808 800 700) to contact France Rénov’ advisors;
- A network of more than 450 “Espaces Conseil France Rénov’” one-stop shops, spread across the country, to inform and advise households. This network, which merges the former Espaces Conseil FAIRE and the ANAH Renovation Information Points (PRIS), will continue its deployment in partnership with local authorities.

⁷⁷ France, Ministry of Ecological Transition (*Ministère de la transition écologique*)(2022), France Rénov: The Public Service for Housing Renovation (“[France Rénov : le service public de la rénovation de l’habitat](#)”).

Within the framework of this network, the support of vulnerable groups is facilitated by the intervention of a specific actor called "*Mon Accompagnateur Rénov*"⁷⁸. A designated person serves as a trusted advisor to guide households through their energy renovation projects. To ensure a secure process, households are required to use *Mon Accompagnateur Rénov* to qualify for the MaPrimeRénov' "*Parcours accompagné*" assistance. Practically, this advisor provides end-to-end support for individuals throughout their renovation process, offering technical, administrative, financial, and social assistance. Only professionals eligible and approved by ANAH, or its delegations, can act as "*Mon Accompagnateur Rénov*",⁷⁹ as explained by one of the interviewees.

Departmental Housing Information Agency:

Moreover, vulnerable groups can be assisted by organisations such as the Departmental Housing Information Agencies (ADIL).⁸⁰ Created at the initiative of the department and the State, ADILs are approved under Article L.366-1 of the CCH (Construction and Housing Code), which defines their role, in particular that of information and advice to the public. Their "role is to inform users free of charge about their rights and obligations, about the housing solutions that are suited to them, in particular about the conditions of access to the rental market and about the legal and financial aspects of their home ownership project, to the exclusion of any administrative, contentious or commercial act" (extract from Article L.366-1 of the CCH). ADILs play a preventive role, in particular for vulnerable groups, by allowing everyone to better understand the legal framework and the solutions suited to their personal situation, and thus make informed choices. The advice provided by ADILs is based on the skills of lawyers trained in all areas related to housing. One interviewee noted that the regional coverage of the network makes it possible to provide a local service to households and to effectively support public policies as close as possible to residents. They can assist people in preparing their applications, or even complete the process on their behalf if requested. Another interviewee agrees that there are systems in place to inform and support individuals who may be fragile.

Other programs:

The MaPrimeRénov' program is not accessible to social landlords. One interviewee notes that for the social housing stock, there is a special system, the integration project management (MOI), which makes it possible to produce quality rental housing for households in the greatest difficulty. It is implemented by associative organizations approved and controlled by the State. This approval is granted according to criteria of

⁷⁸ France, National Housing Agency (*Agence nationale de l'habitat - ANAH*)(2023), « Become My Renovation Guide » ("*Devenir Mon Accompagnateur Rénov*");

⁷⁹ France, National Housing Agency (*Agence nationale de l'habitat - ANAH*)(2024), My Renovation Guide: A Key Player in Renovation ("*Mon Accompagnateur Rénov*, un acteur clé de la rénovation").

⁸⁰ France, National Housing Agency (*Agence nationale de l'habitat - ANAH*)(2023), « ADIL Network » ("*Réseau des ADIL*").

technical, financial but also social capabilities (because the MOI is supported by reinforced social rental management with specific monitoring).⁸¹ This scheme does not raise any particular difficulties in practice.

Another limitation of MaPrimeRénov' lies in the programme's focus on homeowners, which excludes in practice a large portion of energy-poor households who are renters. As many low-income households reside in rented accommodations, this exclusion limits the inclusivity of the programme. According to interviewees, this is the most vulnerable public with the more difficulties to pay renovation work and energy bills. However, in the whole context of the just transition, the risks of exclusion seem mitigated as other energy-saving subsidies are provided for renters, such as MaPrimeAdapt' or the tax credit for equipment expenses designed for older persons or persons with disabilities,⁸² Energy saving certificates,⁸³ Heating Boost Bonus.⁸⁴

3.1.3. Challenges and gaps

The **complexity of the programme** has raised several concerns. Interviewees agree that, over the past decade, accessibility to various programs has improved considerably. However, they are still not universally accessible, particularly because the process remains very complicated. One interviewee alerted that certain individuals, due to specific vulnerabilities (such as the older people, people with disabilities, foreign, impoverished, or less educated people), may encounter practical difficulties in accessing the program, while another interviewee agreed noting that:

“If we take into account building dimensions, energy dimensions, administrative dimensions, financial dimensions and time dimensions, we see that the equation already excludes a lot of people who will self-exclude; and courageous people who will start [the renovation], many will finally give up.” / « Si on prend en compte des dimensions bâtiments, des dimensions énergies, des dimensions administratives, des dimensions financières et des dimensions temps, on voit que l'équation, elle exclut déjà de fait énormément de gens qui vont s'en auto-exclure ; et parmi les courageux qui vont commencer [la rénovation], beaucoup vont abandonner en réalité. »

⁸¹ France, National Housing Agency (*Agence nationale de l'habitat - ANAH*)(2023), Social Project Management: A Mechanism with a Social Purpose (*“La maîtrise d'ouvrage d'insertion, un dispositif à vocation sociale”*).

⁸² France, Directorate of Legal and Administrative Information (2024), MaPrimeAdapt': work to adapt housing to loss of autonomy (*MaPrimeAdapt' : travaux d'adaptation du logement à la perte d'autonomie*), February 2024.

⁸³ France, Directorate of Legal and Administrative Information (2024), Energy Saving Certificates (CEE) (*Certificats d'économie d'énergie (CEE)*), June 2024.

⁸⁴ France, Directorate of Legal and Administrative Information (2024), *“Heating Boost” Bonus*, April 2024.

The complexity of the program can also impact the **practices of energy renovation professionals**. Despite the progress done with the introduction of the "*Mon Accompagnateur Rénov*", the eligibility requirements for MaPrimeRénov' aid still seem somewhat unclear and remain relatively complex, stresses one interviewee. Several interviewees report that the administrative process is burdensome, which can directly impact the behaviour of energy renovation professionals. In some cases, professionals find that completing a MaPrimeRénov' application is very challenging, just to secure a few thousand euros in aid. As a result, they may choose to increase their installation or renovation prices. Later, when the client is ready to sign, they might suggest, instead of pursuing MaPrimeRénov' aid, a reduction in the project cost by €3,000 or €4,000 to avoid the complications associated with the MaPrimeRénov' application. This type of practice is very concerning, particularly from the perspective of protecting "at-risk" individuals, such as vulnerable or older disabled people, who are especially exposed to such practices.

In addition, accessing the aid requires submitting a **digital application** on an online platform before starting the renovation work. However, the digitalisation aspect can be intimidating for some households, particularly older people or those with limited literacy skills, or those who may not have a strong command of the French language. One interviewee commented on this challenge :

"We need to be able to have the right digital agility, avoid providing too many documents, but just what is needed, and then always have the ability to process things in paper format to manage digital divides; particularly for the older people."/ « Il faut aussi être capables d'avoir l'agilité numérique qui va bien, éviter la fourniture de trop de documents, mais juste ce dont il y a besoin, et puis toujours aussi avoir une capacité à traiter des choses en format papier pour gérer les fractures numériques ; notamment pour les personnes âgées. »

The **quality of the technical intervention** is a specific challenge, as maximum intervention quality is needed for vulnerable individuals. However, this is not always the case, alerts an interviewee. Highly specialised associations are needed; they exist but they remain quite limited in number, according to the same source.

In particular, the professional energy renovation sector has not always taken a very pragmatic approach to MaPrimeRénov', an interviewee reported. Some professionals aim to carry out as much work as possible, even if it's not always appropriate. For instance, if there is substantial aid available for a heat pump, they may install a heat pump rather than thermally insulating the house, even though insulating would address a greater proportion of energy use and could reduce greenhouse gas emissions more effectively. One interviewee further highlighted this challenge:

“Since the calculation method [of energy renovation made by professionals in charge of carrying out the work] is not good, we actually have problems at this level.” / « La méthode de calcul [des besoins de rénovation énergétique par les professionnels en charge de la réalisation des travaux] n’étant pas bonne, on a effectivement des problèmes à ce niveau-là. »

The procedure involves a digital application that must be submitted on an online platform before the start of the renovation work. Subsequently, estimations are provided, and once the work is completed, invoices must be submitted. The National Housing Agency (ANAH) is responsible for processing the applications. According to ANAH, the average processing time for a file is less than 5 weeks for a grant application as well as for a payment request.

In practice, there are **delays in processing applications** due to high demand. ANAH has implemented measures to reduce these waiting times, but some delays still occur. This includes processing time and delays in payments, which can be extended by practical issues like work inspections. However, these difficulties are currently being addressed according to the interviewees and the data published.

In order to better remedy such difficulties, an interviewee suggests that it would be useful to dispose more accurate data related to the quality of the service provided:⁸⁵

“It would be interesting to have indicators, to know the average time taken by ANAH to distribute the bonus, the shortest, longest time, etc., an indicator of the quality of the service provided”. / “Il serait intéressant d’avoir des indicateurs, connaître le temps moyen de l’ANAH dans la distribution de la prime, le délai le plus court, le plus long, etc., un indicateur de qualité du service rendu”.

Some interviewees mention the existence of “**regional discrimination**” to the extent that MaPrimeRénov’ “*Parcours accompagné*” depends on the presence of certain actors in a given locality; whether it is the approved actors who support households, or the project managers because certain work projects require compulsory project management, and therefore the use of an architect. One interviewee explained that the implementation of this system also depends on the presence of companies labelled “RGE” (“Recognised Guarantor of the Environment”), because energy renovation work must be carried out by this type of companies to obtain state aid. The problem lies in the fact that these companies are not always present, due to a very fine regional network, or sometimes they are present but in too much demand. An interviewee insists on this need to erase territorial disparities:

“I think that it is essential to involve the territories in governance because ultimately, the energy transition is done in the last mile, "house by house"”. / “Je pense qu’il est indispensable d’associer à la gouvernance les territoires parce que finalement, la transition énergétique, elle se fait dans le dernier kilomètre, « maison par maison »”.

3.2. Impact

According to a study published by the Ministry of Ecological Transition in October 2023, 2 million homes have been renovated, including 210,235 comprehensive renovations.

- 89% of French people who applied for MaPrimeRénov' reported as being satisfied;
- 69% stated that they would not have undertaken the renovations without this aid;
- 68% of beneficiaries are from low-income households, which are defined as households with a standard of living below the fourth decile of the distribution of people's standard of living (income lower of 28 657 € euros per year for a single person for the Ile de France region; 21 805 € outside the Ile-de-France region and overseas).⁸⁶

According to the report of the National observatory on energy poverty (ONPE), between 2020 and 2022, deprivation increased in rural municipalities (+2.0 points) due to high energy expenditure (housing and fuel). Single-parent families and large families are particularly affected by deprivation (3 households out of 10 and 2 households out of 10 respectively).⁸⁷

According to the latest half-yearly satisfaction survey conducted by the National housing agency (ANAH) among 30,000 households, 87% of MaPrimeRénov' beneficiaries said they were satisfied with the scheme and 94% would recommend it to their relatives or friends. Furthermore, 78% of beneficiaries said that their heating costs since their work had decreased and 93% said that they had greater comfort in their homes.

According to the results from the National Observatory for Energy Renovation (*Observatoire national de la rénovation énergétique - ONRE*), with the latest report from October 2023 titled "Energy Renovations Supported by MaPrimeRénov' between 2020

⁸⁶ France, Ministry of Ecological Transition (*Ministère de la transition écologique*)(2023), MaPrimeRénov' 2024: Let's Accelerate Energy Renovation ("*MaPrimeRénov' 2024 : accélérons la rénovation énergétique*"), October 2023; France, National Housing Agency (*Agence nationale de l'habitat - ANAH*)(2024), Financial aid in 2024 (*Les aides financières en 2024*), July 2024.

⁸⁷ France, National observatory on energy poverty (*Observatoire nationale de la précarité énergétique*)(2023), "Energy poverty Dashboard" ("*Tableau de bord de la précarité énergétique*").

and 2022: homeowners, landlords, condominiums,"⁸⁸ the number of applications submitted stabilised around 750,000 following a sharp increase between 2020 and 2021. Given the withdrawal of some applications and the time needed to complete the renovations, only 27% of applications submitted in 2020 were completed within the same year. Since then, the number of finalised applications has significantly increased, reaching over 530,000 in 2022. There was a marked rise in the use of this program in 2022. By the end of 2023, after three years of implementation, 1.7 million MaPrimeRénov' "conventional" applications had been submitted. Of these, 1.4 million (84%) resulted in actual work being undertaken, and more than half—nearly one million—were completed by the end of 2022, with renovations finished and households paid.⁸⁹

Breakdown of the number of MaPrimeRénov' applications according to the four main processing stages from 2020 to 2022

	2020	2021	2022	2020 - 2022
Submitted applications	192 000	765 000	747 000	1 705 000 100 %
Applications approved	141 000	658 000	629 000	1 428 000 84 %
Payment requests	75 000	465 000	584 000	1 124 000 66 %
Applications completed	53 000	366 000	531 000	950 000 56 %

Field: France ; Source: Anah

This data shows the progression from submitted applications to completed ones, demonstrating the scale of the MaPrimeRénov' program from 2020 to 2022. The quantitative success of MaPrimeRénov', created in 2020 in place of the energy transition tax credit (CITE), relied broadly on the enlargement of simple isolated and insufficiently effective renovation "gestures" (changing the boiler, insulating the attic, changing

⁸⁸ France, National observatory on energy poverty (*Observatoire nationale de la précarité énergétique*)(2023), « Energy Renovations Supported by MaPrimeRénov' Between 2020 and 2022: Homeowners, Landlords, Condominiums » (*“Les rénovations énergétiques aidées par MaPrimeRénov' entre 2020 et 2022. Propriétaires occupants, propriétaires bailleurs, copropriétés”*), October 2023.

⁸⁹ France, National observatory on energy poverty (*Observatoire nationale de la précarité énergétique*)(2023), « Energy Renovations Supported by MaPrimeRénov' Between 2020 and 2022: Homeowners, Landlords, Condominiums » (*“Les rénovations énergétiques aidées par MaPrimeRénov' entre 2020 et 2022. Propriétaires occupants, propriétaires bailleurs, copropriétés”*), October 2023, p. 47.

windows, etc.): they related to 86% of the 650,000 works financed with MaPrimeRénov', in 2021, to the detriment of the long-term performance that overall renovation allows. The results were slightly better in the first half of 2022, since 27% of MaPrimeRénov' files related to work involving at least two actions. The recent reform slightly increased in 2023 the overall renovation aid from MaPrimeRénov' for intermediate households (from €7,000 to €10,000) and wealthy households (from €3,500 to €5,000).⁹⁰

Regarding income deciles, 57% of the energy savings from completed applications were attributed to households in the first four income deciles in 2020, compared to 40% for those in the 5th to 8th deciles, and 2% for the top two deciles.⁹¹ With the expansion of MaPrimeRénov' to all households starting in 2021, the distribution by income deciles became more balanced: in 2022, with households in the first four deciles accounting for 43% of energy savings from completed applications, compared to 50% for those in the 5th to 8th deciles, and 7% for the top two deciles.⁹²

Higher-income households undertake more costly projects with less coverage provided by MaPrimeRénov'. The average project cost per MaPrimeRénov' application is close to the overall average for the first eight income deciles but somewhat higher for the 9th decile (€12,222) and significantly higher for the 10th decile (around €15,000). Beyond differences in home size or material quality, this disparity may partly reflect the fact that wealthier households only qualify for insulation aid, which generally has higher average costs. However, due to MaPrimeRénov's tiered allocation based on household taxable income, family size, and region, the subsidy amount decreases with higher income deciles. It averages €4,713 for the 1st decile, is close to the mean for the 5th decile (€3,240), and falls to just below €2,000 for the 10th decile. Consequently, the portion of total project costs covered by MaPrimeRénov' decreases significantly across income deciles: it stands at 44% for the 1st decile, 32% for the 5th, and 13% for the 10th.⁹³

In parallel, MaPrimeRénov' "Copropriété" has been open to all condominium properties since 2021, replacing HMS Copropriétés, which was previously aimed only at "fragile" or "at-risk" condominiums. As a result, the number of units in condominiums benefitting from this aid increased significantly between 2020 and 2022: 25,900 condominium units undertook renovations with MaPrimeRénov' Copropriété support in 2022, up from

⁹⁰ France, Order relating to the energy transition bonus (*Arrêté relatif à la prime de transition énergétique*), 14 January 2020.

⁹¹ Standard of living = disposable income (including social benefits) per household consumption unit.

⁹² France, National observatory on energy poverty (*Observatoire nationale de la précarité énergétique*)(2023), « Energy Renovations Supported by MaPrimeRénov' Between 2020 and 2022: Homeowners, Landlords, Condominiums » (*Les rénovations énergétiques aidées par MaPrimeRénov' entre 2020 et 2022. Propriétaires occupants, propriétaires bailleurs, copropriétés*), October 2023, p. 18.

⁹³ France, National observatory on energy poverty (*Observatoire nationale de la précarité énergétique*)(2023), « Energy Renovations Supported by MaPrimeRénov' Between 2020 and 2022: Homeowners, Landlords, Condominiums » (*Les rénovations énergétiques aidées par MaPrimeRénov' entre 2020 et 2022. Propriétaires occupants, propriétaires bailleurs, copropriétés*), October 2023, p. 34.

11,900 in 2021 and 7,100 in 2020.⁹⁴ However, according to the Abbé Pierre Foundation, for modest co-owners who live in a co-ownership that are not in difficulty, the quotes are poorly covered by public aid. Despite the opening of MaPrimeRénov' to co-ownerships in 2021, an average remaining payment of 70% is generally demanded from precarious households, which is a cost that is impossible to cover. MaPrimeRénov' Copropriétés is not taking off, with 11 energy-inefficient buildings in 2021 alone. In many cases, MaPrimeRénov' Copropriétés" turns out to be less generous for modest co-owners than previous aid, and even less than for wealthy owner-occupiers or lessors of individual housing. An observation widely shared, to the point that ANAH adopted a new, slightly more advantageous scale in December 2022: individual incentives for modest and very modest co-owners double to the level of respectively 1,500 euros and 3,000 euros, while the upper levels of work increased from 15,000 to 25,000 euros (aid covering 25% of the work).⁹⁵

In addition, the renovations supported by MaPrimeRénov' between 2020 and 2022 primarily involved single-family homes: with 92% of the projects completed under MaPrimeRénov' "conventional" over this period, accounting for 93% of associated conventional energy savings, despite single-family homes comprising only 55% of primary residences in 2021 by number of units and 68% by total living area.⁹⁶ Most of the time, single-family homeowners were the best positioned to exercise their rights and undertake renovation work. There is good support for this, with "Recognised Environmental Guarantor" (RGE) certified companies and now professional advisors.

Lastly, interviewees widely acknowledge that MaPrimeRénov' contributes in terms of energy savings and emissions reductions. Many evaluations are based on conventional estimates of savings, related to specific actions over time. However, in practice, when a household moves into a home that is better insulated, it may cost them less, but they might also use more heating for comfort (the "rebound effect"), noted one interviewee. The challenge is to better understand what is actually being done—the type of renovations—and to quantify the "real" impact of these projects in terms of energy savings and avoided greenhouse gas emissions, another interviewee explained. The idea is to capture the "real part" of energy renovation. ONRE examines whether households

⁹⁴ France, National observatory on energy poverty (*Observatoire nationale de la précarité énergétique*)(2023), « Energy Renovations Supported by MaPrimeRénov' Between 2020 and 2022: Homeowners, Landlords, Condominiums » (*“Les rénovations énergétiques aidées par MaPrimeRénov' entre 2020 et 2022. Propriétaires occupants, propriétaires bailleurs, copropriétés”*), October 2023, p. 47.

⁹⁵ France, Fondation Abbé Pierre (2023), « The State of Poor Housing in France » (*“L'état du mal-logement en France 2023”*), p. 151.

⁹⁶ France, National observatory on energy poverty (*Observatoire nationale de la précarité énergétique*)(2023), « Energy Renovations Supported by MaPrimeRénov' Between 2020 and 2022: Homeowners, Landlords, Condominiums » (*“Les rénovations énergétiques aidées par MaPrimeRénov' entre 2020 et 2022. Propriétaires occupants, propriétaires bailleurs, copropriétés”*), October 2023, p. 16.

received aid, and if those who received it see greater or lesser reductions in consumption compared to those who did not receive assistance.⁹⁷

3.3. Information, communication and social acceptability

There has been extensive communication about MaPrimeRénov'. The MaPrimeRénov' programme has given rise to a significant effort on the part of French authorities in terms of communication. There was a campaign aimed at both homeowners and renovation professionals, through different channels: radio, television, written press, etc.⁹⁸

Operational communication regarding access to the MaPrimeRénov' aid is generally handled by ANAH. There have been numerous information campaigns about MaPrimeRénov', according to several interviewees. For example, ANAH has contributed to improving public awareness through useful mobile outreach initiatives, setting up information points in village and town squares more frequently to inform the public about these rights and available options, encouraging people to take an interest. In this respect, it is possible to consider that essential work has been accomplished, which is also recognised by another interviewee:

“ANAH is carrying out a “tour de France” to reach out to users. In fact, I think there is a dual interest: first, to go and educate, to explain, to present the systems, so it is also an approach to “reach out” or to inform. But these are also approaches that allow us to recover information and elements of satisfaction in all ways.” / « L’ANAH procède à un « tour de France » pour aller au contact des usagers. En fait, je pense qu’il y a un double intérêt : d’abord à aller faire de la pédagogie, d’expliquer, de présenter les dispositifs, donc c’est aussi une démarche d’« aller vers » ou pour informer. Mais ce sont aussi des démarches qui permettent de récupérer de l’information et des éléments de satisfaction de toutes les façons. »

In addition, information is available on ANAH’s website, specifically on the MaPrimeRénov' site. According to interviewees, this information is public and easy to

⁹⁷ France, National observatory on energy poverty (*Observatoire nationale de la précarité énergétique*)(2023), « Energy Renovations Supported by MaPrimeRénov' Between 2020 and 2022: Homeowners, Landlords, Condominiums » (*“Les rénovations énergétiques aidées par MaPrimeRénov' entre 2020 et 2022. Propriétaires occupants, propriétaires bailleurs, copropriétés”*), October 2023, p. 16.

⁹⁸ France, France Rénov' (2023), "For your energy renovation, the right choice is France Rénov'!" (« *Pour votre rénovation énergétique, le bon réflexe, c’est France Rénov’* »).

read, but primarily for those who are accustomed to using digital tools. The information on the websites specifically dedicated to the MaPrimeRénov' program (anah.gouv.fr; france-renov.gouv.fr; maprimerenov.gouv.fr) is not available in any language other than French. Only the information provided on the "service-public.fr" website, the official website of the French administration (not dedicated to the MaPrimeRénov' program), where the information may be subject to automatic translation, is accessible in English.

Furthermore, some communication campaigns are currently carried out by the Environment and Energy Management Agency (ADEME) and government ministries about MaPrimeRénov' and energy renovations.⁹⁹

There are also regular information campaigns, including the dedicated website for MaPrimeRénov' advice centers. Every renovation project should ideally start with a consultation with a France Rénov' advisor, who explains what's happening in the region, that people can contact in order to obtain information on what type of renovation they should consider, or what they need for conducting an energy performance audit. Advice centers also guide people on what to watch out for, especially given the concern over frauds.

In a study published by the National agency for housing information (*Agence Nationale pour l'Information sur le Logement - ANIL*) in May 2024, respondents indicated that they felt well-informed about the aid program.¹⁰⁰ More precisely, ANIL questioned nearly 3,000 French households between May and June 2023, including all occupation statuses (owners, lessors and tenants), about the various issues holding them back in terms of energy renovation. The survey was conducted by the ADIL network. This survey revealed that MaPrimeRénov' was among the most well-known aid programs, along with the energy check.

Targeted communication for vulnerable persons was mainly provided by associations in collaboration with ANAH. Beyond what exists nationally and which is implemented locally, local authorities are asked by ANAH to set up the public service for home renovation. For example, the organisation "Solidaires pour l'Habitat (SOLIHA)", which is a national associative network in the housing improvement sector and an approved

⁹⁹ France, ADEME (2020), Press Release "The Ministry of Ecological and Inclusive Transition and the Ministry of Territorial Cohesion and ADEME are launching a new campaign to promote energy renovation" (*Communiqué de presse « Le Ministère de la transition écologique et solidaire et le Ministère de la Cohésion des territoires et l'ADEME lancent une nouvelle campagne pour promouvoir la rénovation énergétique »*), 16 June 2020.

¹⁰⁰ France, National agency for housing information (*Agence Nationale pour l'Information sur le Logement - ANIL*)(2024), Energy Renovation: Challenges, Reasons to Act and Public Engagement, and Consideration in Housing Policies (*"Rénovation énergétique : Enjeux, intérêt à agir et adhésion des particuliers, et prise en compte dans les politiques de l'habitat"*), May 2024, p. 47.

operator of ANAH, completed a series of practical measures to ensure effective access for vulnerable households.

This line of action appears to be fundamental in practice. Many older persons, particularly in rural areas, who are owner-occupiers of their homes, realise that work should be undertaken within their house, to adapt to their aging. The role of actors like SOLIHA is to attract these households within the framework of this type of request, but when there is a need for more global renovation within their housing to be able to properly inform households in order to carry out more global renovation. SOLIHA uses, for example, a “truck”: it is a truck fitted out as “100% adapted housing” for issues of loss of autonomy.¹⁰¹ With regard to the market in rural areas, in which the population is fairly older, this makes it possible to directly show the improvements that can be made in housing and also to raise awareness of energy renovation issues. SOLIHA also has a barnum, that is to say a large tent, a marquee, which is called “100% decent accommodation” where people can receive information on renovation that can be implemented in housing. These local associative actions play a decisive role in effectively reaching vulnerable people, who are naturally the furthest from financial aid.

To sum up, interviewees noted that, in terms of information, progress have been made. However, it is still not enough, as these outreach efforts need to be continuous. According to one interviewee, given the challenges and the pace at which the housing stock needs to be renovated, continuous campaigns are necessary. This view aligns with another interviewee who agrees that there is still room for improvement in terms of ensuring that the information is fully understood by everyone, while the first interviewee insists on the need for continue efforts in terms of information of the public:

“What is certain that more needs to be done, but we can say that compared to what was done before, it is better, it is clearly better.”/ « Ce qui est sûr c’est qu’il faudra faire plus, mais on peut dire que par rapport à ce qu’il se faisait avant, c’est mieux, c’est nettement mieux.”

3.3.1. Challenges and gaps

Regarding unintended negative consequence, fraudulent practices have emerged in relation to the MaPrimeRénov’ programme. Fraudulent practices are developed by intermediaries who intervene within the framework of this public service (for example, trusted people who are supposed to support vulnerable people in their efforts, called

¹⁰¹ France, France, Solidarity for housing (*Solidaire pour l’Habitat - SOLIHA*), The SOLIHA truck (*Le truck SOLIHA*).

“*Mon Accompagnateur Rénov*”), or professionals who carry out energy renovation work.

This particular challenge in terms of information and communication lies in the fact that misleading information can be intentionally directed at vulnerable people, such as isolated older people, who can quickly become victims of scams. There is a high concentration of aid for the most vulnerable populations—those with limited knowledge, less access to information, and fewer support networks. For the older people, access to information is a primary concern. Ill-intentioned professionals may offer them services that are not at all suited to their lifestyle.

More specifically, people in vulnerable situations, such as older people, people with disabilities, poorly educated people, are often approached by door-to-door salespeople (despite the ban) or by phone (which is also prohibited), who try to sell them products largely covered by public subsidies, according to the interviewees. There is significant public assistance available, and unscrupulous operators attempt to capture as much of it as possible by installing unsuitable equipment that becomes dysfunctional over time, at the expense of vulnerable individuals. They may then face difficulties in covering maintenance costs for these installations. For example, if a heat pump is installed for €1 in an "energy-inefficient" home, issues may arise. The installation could quickly break down, leaving a vulnerable person with a non-functioning heat pump and without the means to repair it. Public aid attracts eco-delinquents. The challenge of structuring aid to make it almost free can have unintended consequences if individuals are not supported effectively. These people need "hand-holding" to protect them from MaPrimeRénov' scams, according to one interviewee.

French legislators have taken steps to prohibit solicitation. Since the law of 24 July 2020, aimed at regulating telephone canvassing and combating fraudulent calls, telephone canvassing in the energy renovation sector is strictly prohibited by law.¹⁰² However, fraudulent practices remain difficult to control, despite inspections by the Directorate-General for Competition, Consumer Affairs, and Fraud Control (DGCCRF). It is challenging to curb this completely, according to the same source.

ANAH responds to attempted fraud by increasing its levels of control to ensure the quality of work, protect households, preserve the image of construction companies and ensure the proper use of public money. In April 2024, ANAH announced that it would be stepping up its identity theft checks to protect MaPrimeRénov' beneficiaries against acts of energy renovation fraud. Faced with the increase in identity theft attempts by households and businesses, ANAH launched a major campaign to verify the identity of

¹⁰² France, Law No. 2020-901 aimed at regulating telephone canvassing and combating fraudulent calls (*Loi n° 2020-901 visant à encadrer le démarchage téléphonique et à lutter contre les appels frauduleux*), 24 July 2020.

some of its beneficiaries. Several thousand households received a letter to ensure that they are indeed the source of the work declared on the dedicated internet platform (maprimerenov.gouv.fr). ANAH warned that these additional procedures are likely to lengthen the processing times for these files, but that they are essential to securing households' in their renovation initiatives and identifying malicious actors.¹⁰³

3.3.2. Public perceptions and social acceptability

There have been several phases and moments that need to be considered to understand the issue of public perception and social acceptability. In this respect, MaPrimeRénov' is still widely perceived as a useful and relevant form of assistance.

It is however possible to identify certain points of criticism for individuals benefiting from the MaPrimeRénov' programme. Interviewees noted that while the payment of financial aid must in principle precede the completion of the renovation work, in practice these payments may be delayed. Some projects that have been started are thus struggling to be completed before the end of the year. In addition, the changes made to the programme year after year, which must be balanced with the need for stability, as noted by one interviewee, can generate uncertainties for some stakeholders in the programme.

The French Public Defender of Rights (*Défenseur des droits*) was contacted by several users dissatisfied with the MaPrimeRénov' programme because of its dysfunctions. The Public Defender of Rights issued a decision highlighting some of these issues.¹⁰⁴ This institution received 500 complaints, primarily because, in the beginning, applications were not progressing, and the processing was too slow, resulting in delayed payments to companies. This, in turn, led to a significant number of complaints.

Additionally, professionals have voiced criticisms, suggesting that the program could be simplified and that certain processes could be handled differently according to one interviewee. Some advocate for less targeted aid. Sometimes, due to the delay in processing and disbursing the aid, the professional doesn't get paid immediately, effectively acting as a "banker for the state", one interviewee explained. The homeowner has to receive the aid before the professional can be paid, putting the business at risk. As a result, some RGE-certified companies are leaving the MaPrimeRénov' market because the upfront capital needed while waiting for the

¹⁰³ France, National Housing Agency (*Agence nationale de l'habitat - ANAH*)(2024), Press Release « MaPrimeRénov' : The Anah Strengthens Its Identity Theft Controls » (*Communiqué de presse « MaPrimeRénov' : l'Anah intensifie ses contrôles en matière d'usurpation d'identité »*), April 2024.

¹⁰⁴ France, Public Defender of Rights (*Défenseur des droits*), [Decision 2022-199](#), 14 October 2022.

subsidies is too high. They prefer to focus on solvent clients who aren't relying on state aid.

3.3.3. Reasons behind the public perceptions/social acceptance

The factors influencing public perception are numerous, such as living comfort, economic, technical and administrative reasons.

First of all, there is the issue of **comfort—living** in a home where one does not feel cold. There is also an economic concern related to energy bills, as energy prices in France had risen significantly. The cost of energy had reached such high levels that some households were choosing not to heat parts of their homes. With significant sums of money involved, there are many competing interests on both sides, which inevitably leads to some people being more satisfied than others.

Another concern related to the MaPrimeRénov' programme lies in **technical and administrative access difficulties**. The system that provides these services—namely, the MaPrimeRénov' platforms and administrative procedures—can be off-putting. The complexity of the administrative steps required to complete an application often becomes an "obstacle course," leading to a lack of acceptance of the programme itself. According to one interviewee, with this type of aid, where the majority of cases go smoothly and overall satisfaction levels are high, it only takes 10% of problematic cases to create the impression that the entire system needs to be overhauled, which is not true.

3.4. Stakeholder engagement and participation

In France, several forms of collaboration were involved to shape the framework of MaPrimeRénov', based on different levels of engagement. However, the degree of inclusiveness in the elaboration of MaPrimeRénov' raises certain reservations. While all interviewees highlighted the increasing inclusion of relevant stakeholders, some of them emphasised that their input was not always taken into account in the final decisions.

More precisely, the National Housing Agency (ANAH)'s board of directors includes different colleges representative of the actors who can be involved at the moment; there are communities that are present; there are representatives of the people, companies. These aids, especially the MaPrimeRénov' "*Parcours par geste*" component,

are all subject to review by the National Housing Council,¹⁰⁵ which is a consultative body with an incredible number of partners. Feedback is plentiful, partly because ANAH also makes a point of conducting "tours of France". There's also feedback from the advice centers. When an issue arises, the National agency for housing information (ANIL) identifies legal or practical obstacles and reports them to ANAH, just as other information actors do. This feedback allows for improvements to be made to the program.

All interviewees agree that the design of MaPrimeRénov' programme is increasingly based in practice on the involvement of several stakeholders. Two interviewees in particular underline that civil society organisations participate in discussions on these types of programs, including UFC-Que Choisir, the National Association of Consumers and Users (CLCV), the Réseau Cler, Climate Action Network, the Abbé Pierre Foundation, Secours Catholique, and other organised groups whose role is to influence and act on public policies to make them more accessible and better serve those most in need.

However, interviewees have noted some challenges. One interviewee pointed out that the individuals consulted have not always been sufficiently listened to:

“On [the level of taking into account the opinions of experts], there is indeed a greater effort to be made to try to be more coherent”. / “Sur [le plan de la prise en compte de l’avis des experts], il y a effectivement un effort plus important à faire pour essayer d’être beaucoup plus cohérents”.

Experts are heard during the design phase of implementation, but their input is not always taken into account in the final decisions. The authorities could make a stronger effort to ensure greater consistency by considering expert opinions in decision-making. This contrasts with the opinion of another interviewee, who advocated the participatory process for MaPrimeRénov, noting that this energy renovation policy is deeply rooted in the local level—it is implemented locally. Local authorities, for instance, can complement the policy and provide additional support. Local housing renovation programs are organised, involving a wide range of actors and requiring significant coordination efforts to successfully implement them.

¹⁰⁵ France, Ministry of Ecological Transition (*Ministère de la transition écologique*)(2021), « National Housing Council » (*“Conseil national de l’habitat”*), 3 March 2021.

3.5. Governance and accountability, data and monitoring

3.5.1. Governance and monitoring

The ANAH, the agency responsible for implementing government decisions, is in charge of overseeing the MaPrimeRénov' program. This includes monitoring statistics, managing the processing of applications, and coordinating the overall instruction process.¹⁰⁶ It manages statistical tracking and application processing, and coordinates the entire examination process. ANAH conducts statistical monitoring and presents data during its board meetings and various committees, covering the number of aids distributed, the nature of the work, and the regions involved. Specific targets have been set in legislation regarding the number of renovations to be completed. In December 2023, the ANAH Board of Directors adopted a 2024 budget of over €6 billion.

In addition, the National Observatory for Energy Renovation (ONRE)¹⁰⁷ operates under the ministry's statistical department. It analyses a variety of data, and our department, responsible for economic, financial, fiscal, and budgetary matters, collaborates with this service to see if useful data can be generated. Every three years, the ONRE conducts a survey on energy renovation, gathering input from households, property managers, condominium associations in the private sector, and social housing providers for council or public housing (HLMs). The aim is to measure not only supported renovations but also those done without aid, as not everyone benefits from assistance, and part of the renovation work is done independently. This survey provides more qualitative insights, exploring what prompts people to seek or forgo assistance and the factors driving households to apply for aid. ONRE also collects data on the "perceived" progress after renovation, asking households questions such as: Has the renovation improved their quality of life? Has it reduced their energy consumption? As one interviewee explained it:

“While administrative sources allow us to have data, it is always useful to supplement these sources with surveys which allow us to have more qualitative information, even if they are used statistically regarding the motivations of households.” / « Les sources administratives permettent d’avoir des données, mais c’est toujours intéressant de compléter ces sources par des enquêtes qui permettent d’avoir des informations plus

¹⁰⁶ For more information, see the webpage of [National Housing Agency \(Agence nationale de l’habitat - ANAH\)](#).

¹⁰⁷ For more information, see the webpage of [National energy renovation observatory \(Observatoire national de la rénovation énergétique - ONRE\)](#).

qualitatives, même si elles sont exploitées de manière statistique sur les motivations des ménages. »

ONRE's results are published. The latest report, released in October 2023, is entitled "Energy Renovations Supported by MaPrimeRénov' between 2020 and 2022: Homeowners, Landlords and Condominiums".¹⁰⁸ It assesses households' access to the programme based on their income levels, and for both MaPrimeRénov' "par geste" and "global renovations," it highlights regional disparities in the implementation of the program. In this regard, one interviewee insisted on the importance of monitoring the work carried out:

“There is a significant focus on monitoring the work being carried out. Given the number of aids distributed, there is very detailed tracking.” / « L'accent est mis sur le suivi des travaux en cours. Compte tenu du nombre d'aides distribuées, il existe un suivi très détaillé. »

Furthermore, there are checks in place to detect fraudulent practices among professionals performing energy renovations. The General Directorate for Competition, Consumer Affairs, and Fraud Prevention (DGCCRF)¹⁰⁹ has conducted inspections, leading to sanctions. One interviewee mentioned that some court decisions have resulted in prison sentences for professionals due to their misconduct. In September 2024, the DGCCRF and ANAH drew up a report on their action in the fight against fraud in the energy renovation sector. In 2023, the DGCCRF inspected nearly 800 operators in the sector, more than 50% of whom presented anomalies, to varying degrees of seriousness. It was specified that due to the targeting of the investigations, this rate of non-compliance was not representative of the energy renovation sector as a whole. 25% of the establishments gave rise to repressive action (i.e. nearly 200 criminal reports and administrative fines).¹¹⁰

¹⁰⁸ France, National energy renovation observatory (*Observatoire national de la rénovation énergétique - ONRE*)(2023), Energy renovations supported by MaPrimeRénov' between 2020 and 2022: Owner-occupants, landlords, and condominiums (*“Les rénovations énergétiques aidées par MaPrimeRénov' entre 2020 et 2022. Propriétaires occupants, propriétaires bailleurs, copropriétés”*), October 2023.

¹⁰⁹ For more information, see the webpage of [Directorate General for Competition, Consumer Affairs, and Fraud Control \(“Direction générale de la concurrence, de la consommation et de la répression des fraudes”\)](#).

¹¹⁰ France, National Housing Agency (*Agence nationale de l'habitat - ANAH*)(2024), Press Release “Combating Fraud in the Energy Renovation Sector: The DGCCRF and Anah Review Their Actions and Urge Consumers to Stay Vigilant” (*Communiqué de presse “Lutte contre la fraude dans le secteur de la rénovation énergétique : la DGCCRF et l'Anah dressent un état de leur action et appellent les consommateurs à la vigilance”*), 18 September 2024.

3.5.2. Current data availability

First and foremost, data is collected on the number of grants distributed. According to figures provided by ANAH, 124,903 households have applied for this aid by submitting a file since the beginning of 2024, with a significant increase in applications since May 15.¹¹¹ Since 2020, MaPrimeRénov' has facilitated the renovation of more than 2.3 million homes, including 268,143 large-scale renovations, generating over €32 billion in total renovation work. In addition, data has been collected on the environmental impact of the aid: the total energy savings achieved through MaPrimeRénov' amount to 14.44 TWh/year, equivalent to the annual energy consumption of the combined populations of the cities of Lyon and Paris.¹¹²

Data has also been collected regarding the environmental impact of the aid.

According to a study released by the Ministry of Ecological Transition in October 2023, achieving France's climate goals for 2030 and 2050, as well as improving citizens' quality of life, requires ramping up the pace of large-scale renovations. This is considered the most effective way to eliminate energy-inefficient homes. The goal is to complete 200,000 thermal renovations by 2024, more than doubling the current annual rate. At the same time, the pace of phasing out fossil fuel-based boilers needs to speed up, aiming to eliminate approximately 75% of oil boilers and 20% of gas boilers (excluding hybrids) by 2030. To address both challenges, MaPrimeRénov' will evolve to maintain the effort to decarbonise homes and speed up large-scale renovations, with a particular focus on energy-inefficient homes.¹¹³

According to figures provided by ONRE, in 2022, the energy savings from projects supported by MaPrimeRénov' "conventional" are estimated at 3.7 TWh/year for initiated projects and 3 TWh/year for completed ones. The reduction in greenhouse gas (GHG) emissions from initiated projects is estimated at 1.56 million tons of CO₂ equivalent per year. On average, the energy savings per supported household are about 6 MWh/year.¹¹⁴

¹¹¹ France, National Housing Agency (*Agence nationale de l'habitat - ANAH*)(2024), MaPrimeRénov' Overview for the First Half of 2024 (*Bilan de MaPrimeRénov' au 1er semestre 2024*), July 2024.

¹¹² France, Ministry of Ecological Transition (*Ministère de la transition écologique*)(2023), MaPrimeRénov' 2024: Let's Accelerate Energy Renovation (*MaPrimeRénov' 2024: accélérons la rénovation énergétique*), October 2023.

¹¹³ France, Ministry of Ecological Transition (*Ministère de la transition écologique*)(2023), MaPrimeRénov' 2024: Let's Accelerate Energy Renovation (*MaPrimeRénov' 2024: accélérons la rénovation énergétique*), October 2023.

¹¹⁴ France, National energy renovation observatory (*Observatoire national de la rénovation énergétique - ONRE*)(2023), Energy renovations supported by MaPrimeRénov' between 2020 and 2022: Owner-occupants, landlords, and condominiums ("*Les rénovations énergétiques aidées par MaPrimeRénov' entre 2020 et 2022. Propriétaires occupants, propriétaires bailleurs, copropriétés*"), p. 4, October 2023.

Furthermore, according to figures provided by the Environment and Energy Management Agency (ADEME), from the point of view of the performance objective, the co-ownership sector has the particularity of requiring a global approach: renovations must make it possible to achieve at least 35% energy savings. This often corresponds to multi-batch operations. On the first 29 files, ANAH noted an average of 45% energy savings. However, only 225 accommodations (15% of the total) make it possible to reach classes A and B and 2 thirds of the operations do not allow more than one class to be gained. Reaching the lowest level of class B, for housing in energy classes D, E, F or G, would require at least 39%, 56%, 67% or 74% energy savings respectively. We are therefore far from being in line with the objectives of the National Strategy Low Carbon (*Stratégie Nationale Bas-Carbone* – SNBC), neither in volume nor in performance of the renovations carried out.¹¹⁵

3.5.3. Challenges

One of the key challenges faced at the Ministry of Energy Transition is calculating and appreciating the real work done, the types of renovations, and translating the "reality" of the work into energy savings and avoided greenhouse gas emissions.

One interviewee noted that more information is currently available, providing insight into how the programme is functioning. However, there is room for improvement in this matter. Another interviewee underlined that comprehensive analytical reports are produced, but they are not easily accessible and are not always immediately available to the public.

3.5.4. Complaints mechanisms

In the event of fraud, it is possible to report it through the dedicated platforms. If someone has had work done that does not meet standards, they can report it on the ANAH and MaPrimeRénov' websites.¹¹⁶

If a user encounters a specific difficulty in accessing the aid, they can contact ANAH, as there are internal mechanisms within the institution to address such problems. Two interviewees explained that in general, a person can appeal against ANAH's decision. They can submit a new application, request support, visit a France-Rénov advice center, and receive explanations. It is also possible to file a formal appeal against the grant rejection decision. Documents are provided that specify the number of days the

¹¹⁵ France, ADEME (2022), Report « Financing the Energy-Efficient Renovation of Housing : Proposals for Public Policy Directions» (*Rapport "Financer la rénovation énergétique performante des logements: Propositions d'orientation des politiques publiques"*), p. 47.

¹¹⁶ See France rénov', [Reporting form \("Formulaire de signalement"\)](#).

individual has to appeal against the decision, contest it, and submit additional documents.

If the issue is not resolved, the user can also escalate it to the Public Defender of rights. The issue of time remains a persistent source of dissatisfaction among the public. Between 2020 and 2022, the Defender of Rights received nearly 500 complaints regarding the difficulties faced by applicants in asserting their rights to the aid. The Defender identified numerous shortcomings in the processing of these applications.

Each decision made by the ANAH includes information on the appeal process and deadlines. There are Mandatory Prior Administrative Appeals (RAPO) and Contentious appeals:

Mandatory Prior Administrative Appeal (RAPO): Article 9 of Decree No. 2020-26 of 14 January 2020, relating to the energy transition grant stipulates that the introduction of a contentious appeal before the administrative court regarding decisions related to the energy transition grant—whether explicit or implicit (the principle of French administrative law: silence is deemed rejection after two months in financial matters)—is subject to the prior exercise of an administrative appeal with the Director General of the ANAH. It should be noted that the RAPO is governed by Articles L. 412-1 to L. 412-8 of the Code of Relations between the Public and the Administration (CRPA). Therefore, before any contentious appeal, a RAPO must be filed within two months from the notification date of the decision. The requirement to present a RAPO is mandatory, and failure to do so renders the legal challenge inadmissible. The Council of State has ruled that this constitutes a manifest inadmissibility, which cannot be remedied during the proceedings (CE, December 10, 1975, Dame Grou, Lebon T. 1216). The RAPO allows anyone to contest a decision made by the Administration before bringing the case before the administrative court. The goal is to achieve an amicable resolution (outside of litigation) through a re-evaluation of the user's file, both in fact and law, in accordance with the aforementioned CRPA. To this end, in October 2024, the Legal Affairs Department of the ANAH created a "mediation" unit aimed at reducing contentious appeals and facilitating the amicable resolution of cases with users, particularly in collaboration with the Bercy mediator.

Contentious appeals: Under Article R. 421-1 of the Administrative Justice Code, the jurisdiction territorially competent can only be referred to through an appeal against a decision, and this must occur within two months from the decision taken on the RAPO, whether it is an explicit or implicit rejection.

4. Conclusions and key recommendations

The MaPrimeRénov' programme has acquired a central place in the fight against energy poverty and the achievement of the energy transition in France. Interviewees widely highlighted the positive impact of this financial support with a view to improving energy efficiency as well as to promoting a just transition. They also recognized the progress made since the creation of this programme in terms of information and broad accessibility in practice. However, interviewees raised a certain number of difficulties and concerns that suggest ways for improvement likely to strengthen the effectiveness of this programme and better achieve the objectives pursued.

All interviewees acknowledged that the MaPrimeRénov' programme was an essential initiative to support low-income households in the context of energy transition. They stressed the relevance of this use of public funds while encouraging the continuation of efforts to better reach the most modest households. In addition, the institutionalization of certain guarantees for personalized technical support of households is welcomed as a decisive step forward in access to MaPrimeRénov' aid. In this regard, the persistent limits to the effectiveness of the system are not seen as reasons for questioning it, but rather as imperfections that need to be corrected in the years to come.

Beyond its positive impacts, stakeholders noted limitations in the programme's effectiveness. They all insisted on the complexity that characterizes the rules governing access to MaPrimeRénov' aid. In particular, the rules related to the eligibility conditions, the types of work that can be undertaken, the various components of the programme, as well as the instability of the rules make MaPrimeRénov' a very complicated programme. This complexity limits the programme's capacity to further increase the number of renovations carried out and to promote social justice.

Another recurring theme was the fraudulent practices that emerged. More specifically, people in vulnerable situations, such as older people, people with disabilities, poorly educated people, are often approached by salespeople (despite the ban) who try to sell them products that however become dysfunctional over time.

Several key recommendations were put forward during discussions with a view to improving the programme. According to interviewees, it would be very beneficial to **stabilize the normative framework and simplify the regulations**. Carrying out such adjustments could make MaPrimeRénov' programme more accessible and user-friendly. Several interviewees emphasised the value of having clear rules:

“That means the rules applicable to this aid—we could perhaps simplify them further because there's a lot of complexity in the scheme that's been implemented; it's quite complex to understand.” / « Ça veut dire que pour les règles applicables à cette aide, on pourrait encore peut-être simplifier les choses parce qu'il y a beaucoup de complexité sur le dispositif qui est mis en place, il est assez complexe à comprendre. »

Recommendations for improving the development of the **information and advice network** aim to better involve vulnerable people in the energy transition. Interviewees pointed out that these people may not have the necessary awareness or ability to apply for available aid without this kind of support. Beyond the financial aid itself, this type of personalized support appears essential to motivate individuals to undertake renovations. Further progress on this point could significantly improve energy efficiency and align with long-term sustainability goals. For example, one interviewee suggests that facilitating energy renovations for older people would be common sense. Such renovations could protect them during their remaining years from the severe health impacts of energy poverty or from unaffordable bills when their income is limited.

Moreover, promoting the **coherence of renovations undertaken** was seen as essential, since the current structure of MaPrimeRénov' (divided into 3 pillars) remains problematic. According to some interviewees, this programme is often applied in a "patchwork" manner. The approach of performing renovations by isolated acts (for example, just changing a boiler), rather than global renovations, generally results in mediocre outcomes. In addition, MaPrimeRénov' primarily focuses on thermal renovations—technical equipment like heat pumps, heating systems, etc.—while photovoltaic production is not covered. As a result, vulnerable individuals cannot reduce their bills with photovoltaic energy, as they cannot afford the "remaining balance" for such installations. Ultimately, only lower- and upper-middle-class households can invest in photovoltaic self-consumption to reduce electricity bills. One interviewee suggested exploring a dual targeting approach, focusing on both energy-inefficient homes and very modest households.

4.1. Main effects

The interviews bring out that MaPrimeRénov' financial aid is perceived as a key measure to improve people's well-being in their daily lives and to better achieve France's objectives in terms of its international commitments for energy and climate. The interviewees unanimously recognized that this programme represents a major contribution to alleviating energy poverty and achieving an effective energy transition. There have been several encouraging developments.

The creation of the MaPrimeRénov' programme is socially targeted towards **lower-income individuals and households**. There has been progress on this front according to several interviewees. National authorities and civil society association agree that there is no doubt that MaPrimeRénov' is reaching its intended beneficiaries.

There are certainly positive effects **in terms of energy renovation**, as MaPrimeRénov' aid allows households to undertake energy renovation work that they otherwise may not have pursued. Interviewees explain that some types of work, such as replacing a boiler, can be carried out quickly and easily. While this may not be the most impactful renovation in terms of energy efficiency, it can serve as a first step that may lead to more effective and comprehensive renovations in the future. The best year for MaPrimeRénov' was 2022, with 700,000 renovations completed, which is close to the set objective (800,000); in 2023, there were 600,000, slightly fewer, but this was already a significant number. In 2023, approximately 570,000 homes were renovated, which reflects a decrease with a result lower than the set target (720,000 energy renovations over the year), but there were more significant, large-scale renovations (71,613 major renovations in all, representing an increase of 8.6% compared to 2022) with a real impact on reducing greenhouse gas emissions and energy consumption.

4.2. Challenges and gaps

4.2.1. Reduce complexity: find a balance between normative obligations and incentives

The MaPrimeRénov' programme has undergone numerous regulatory changes since its inception. Whenever adjustments are made, it is typically to resolve an issue or address an unanticipated question. One interviewee explained that the challenge lies in the fact that as the regulations are changed, the more complex and frequently changing the programme becomes, the harder it is for stakeholders to fully grasp and adopt it. The programme has become highly volatile, making it difficult for stakeholders to understand, adopt, and implement effectively. Explaining and applying it remains a complex task, according to another interviewee. The rules governing access to this aid remain complicated, whether they relate to the eligibility conditions, the types of work that can be undertaken, or the various MaPrimeRénov' programs (MaPrimeRénov' "*Parcours par geste*", MaPrimeRénov' "*Parcours accompagné*", MaPrimeRénov' "*Co-propriété*"). This complexity makes it challenging for beneficiaries to navigate through the process effectively.

Interviewees highlight that pushing towards global renovation and large-scale renovation is more difficult and slower. The idea is to encourage people for whom the

aid provides a true "leverage effect," without which they wouldn't have undertaken the work. As one interviewee points it out, the balance between normative, regulatory obligations, and incentives is key:

“The fact is that it necessarily requires a longer work time, the cost is much higher, and, especially for people who live in their homes, it causes real disruptions to the rhythm of daily life throughout the work.” / « Le fait est que cela demande forcément un temps de travaux plus long, c'est un coût beaucoup plus important, et c'est surtout pour des gens qui vivent dans leur logement cela engendre des dérangements réels de rythme de vie au quotidien pendant tout le temps des travaux. »

4.2.2. Calculate the impact of energy renovation

Another challenge identified by some interviewees is the calculation of the impact of energy renovation. The Energy Performance Diagnosis (DPE)¹¹⁷ has two components: an energy efficiency component—focused on energy consumption—and a greenhouse gas emissions component. MaPrimeRénov', which aims to promote energy renovation, aligns with the policy objectives.

The actual savings calculated by the National energy renovation observatory (ONRE) are primarily viewed from an energy perspective, explained one interviewee. What remains to be improved is to accurately determine the impact of energy renovation on reducing greenhouse gas emissions and energy consumption. Two interviewees noted that this is currently calculated, through theoretical models: we estimate the aggregate energy and greenhouse gas reduction effects per individual action or comprehensive approach, compile them, and incorporate them into national statistics. In particular, another interviewee insisted on this challenge:

“What we must keep in mind is that there are some energy sources that emit more greenhouse gases than others. For example, while changing the boiler may increase energy efficiency, it will be somewhat misleading in terms of gas emissions. Moreover, high-performance gas boilers are no longer subsidized by MaPrimeRénov’.” / « Ce qu'il faut avoir en tête c'est qu'il y a des sources d'énergie qui sont plus émettrices de gaz à effet de serre que d'autres. Par exemple, en changeant de chaudière, on peut gagner du point de vue de l'efficacité énergétique, mais ce sera quelque part assez trompeur en termes de l'émission [de gaz à effet de serre]. D'ailleurs, les chaudières à gaz très performantes ne sont plus subventionnées par MaPrimeRénov’ . »

¹¹⁷ France, Public service (*Service public*)(2024), Energy Performance Diagnosis (DPE) (*Diagnostic immobilier : diagnostic de performance énergétique (DPE)*).

4.3. Lessons learned and good practices

The MaPrimeRénov' programme reflects a state-driven initiative to invest public funds in financing such projects, making it a political choice with positive outcomes that may serve as a valuable model for other European countries, according to interviewees.

The creation of the MaPrimeRénov' "Parcours accompagné" pillar is considered by national authorities and civil society associations as a good practice. It is very important that the MaPrimeRénov' programme remains accessible through intermediaries, especially for individuals who are unable to complete the various steps of the procedure themselves. Two interviewees agree that one significant outcome of this pillar is that the energy efficiency is improved. For another interviewee, it would be very beneficial to continue the progress made in 2023 with MaPrimeRénov' through the design of the "Parcours accompagné".

Another good practice mentioned by the interviewee is the OSCAR programme. OSCAR supports building professionals committed to energy renovation and provides guidance on managing public assistance (MaPrimeRénov') through a national network of Renovation Assistance Advisors, practical simplification tools, and hands-on support.

4.4. Recommendations

Several recommendations emerged from the interviews for improving both the structure and implementation of MaPrimeRénov' programme.

- **Simplify and stabilize normative framework:** Introducing a simpler and more stable normative framework could make the process more accessible and user-friendly. There is room to further streamline the rules governing access to this aid, the types of eligible work, and the integration of the various MaPrimeRénov' programmes.
- **Promote global renovations:** Several interviewees insisted on the need for an increase in the number of overall renovations undertaken. This involves developing pedagogical communication to convince and motivate households, especially low-income households, of the benefit of engaging in such an initiative despite the constraints that this type of work generates.
- **Enhance methods of calculation of the impact of energy renovation:** Many interviewees suggested that better visibility and knowledge of the contribution

of the renovation work carried out would make it possible to better appreciate the contribution of the MaPrimeRénov' programme to the energy transition in France. This involves collecting more clear data to improve the transparency of public action.

- **Increase control of fraudulent practices:** In addition to the dissuasive effect that the existence of such practices has on vulnerable people, such practices can lead to poor quality work being carried out which hampers the effectiveness of the energy transition. A strong consensus amongst interviewees was to underline the importance of a stricter fight against fraudulent practices of energy renovation companies. Checks of the work carried out and the imposition of sanctions should be more systematic.

Annexes

Annex I. Design of the action

Information about the action	
<p>Objective</p> <p><i>Please include:</i></p> <ul style="list-style-type: none"> • Objective • Area of contribution • Explicit focus 	<p>MaPrimeRénov' helps to finance work to improve the energy performance of homes. MaPrimeRénov' aims to finance insulation, heating, ventilation or energy audit work on an individual house or an apartment in an apartment building.</p> <p>MaPrimeRénov' is the main form of assistance available to households to change their heating or hot water systems to more environmentally-friendly ones.</p>
<p>Background</p> <p><i>Please include:</i></p> <ul style="list-style-type: none"> • Starting date • Origin and development • Rationale • Stakeholders involved 	<p>The Integrated national energy and climate plan for France (<i>Plan national intégré en matière d'énergie et de climat</i>), adopted in 2020, provides for this financial measure (MaPrimeRénov') with the aim to boost renewable heat production.</p> <p>MaPrimeRénov' was created by Finance law No. 2019-1479 for 2020. Launched on 1 January 2020, this financial aid programme replaces the tax credit for energy transition ("<i>Crédit d'Impôt pour la Transition Énergétique</i>" - CITE) and aid from the National Housing Agency (ANAH) "Living Better Agility". The CITE was an income tax credit on housing energy efficiency expenditures and on some renewable energy investments. The CITE was designed to support the government's goals regarding energy efficiency and greenhouse gas emissions.¹¹⁸</p> <p>MaPrimeRénov is still in force.</p>
<p>Timeline</p> <p><i>Please include:</i></p> <ul style="list-style-type: none"> • Timeline and duration 	<p>No end date has been set.</p>

¹¹⁸ France, Ministry of Economy (*Ministère de l'économie*)(2024), « CITE-Tax credit for energy transition » ("*Le CITE, crédit d'impôt transition énergétique*").

<ul style="list-style-type: none"> • Milestones, reviews, amendments planned 	
<p>Scope and development</p> <p><i>Please include:</i></p> <ul style="list-style-type: none"> • Activities included • Planned developments, phases, repetitions or other • Project continuation in the future 	<p>Launched on 1 January 2020, MaPrimeRénov' replaces the tax credit for energy transition (CITE).</p> <p>Since 1 October 2020, MaPrimeRénov' has been accessible to all owners, regardless of their income, whether they occupy their home or rent it out. Landlords have been able to submit their aid application file since 1 July 2021.</p> <p>Since 1 January 2022, MaPrimeRénov' has been reserved for housing built at least 15 years ago, in order to reinforce the renovation of old housing. However, it remains possible to benefit from MaPrimeRénov' for all houses built more than two years ago to replace an oil-fired boiler.</p> <p>In 2022, the MaPrimeRénov' system supported energy renovations in the residential sector in various ways: renovation actions subsidised by "conventional" MaPrimeRénov' for owner-occupiers and landlords; global renovations leading to substantial energy gains aided by the MaPrimeRénov' "conventional" global renovation package, MaPrimeRénov' "Sérénité, Loc'Avantages" with energy works and MaPrimeRénov' "Copropriétés".</p> <p>Currently, MaPrimeRénov' assistance is available as three components:</p> <p style="padding-left: 40px;">-MaPrimeRénov' "<i>Parcours par geste</i>": this is the main help for carrying out one or more insulation jobs, changing carbon-free heating or domestic hot water system.</p> <p>It is available to various categories of property owners, including owner-occupants, landlords, usufructuaries, holders (both occupants and landlords) of a real right granting use of the property, leaseholders (both occupants and landlords) of an emphyteutic or construction lease, and co-owners in joint ownership, provided that all co-owners have signed a sworn statement designating the applicant to carry out the renovation on behalf of the joint ownership. However, bare owners (nue-proprietaires),</p>

social landlords, tenants and legal entities (such as real estate investment companies or SCIs) are not eligible.

This financial aid is granted based on income, taking into account both the applicant's earnings and those of all individuals residing in the household. The level of aid provided is proportional to the applicant's income—the lower the income, the higher the aid.

In order to benefit from MaPrimeRénov' assistance "*Parcours par geste*", the accommodation must be: occupied as a main residence for at least eight months per year; and built at least 15 years ago in mainland France or two years ago overseas. In case of a rent, the landlord must agree to rent their property as their main residence for a period of six years and within one year following the date of request for payment of the balance of the premium.¹¹⁹

Moreover, there are some specific conditions that must be met: the company performing the work must be RGE-certified ("recognized environmental guarantor"), and the application must be submitted before the work begins.¹²⁰ One last condition initially required has been removed. From 1 January 2020 to 15 May, people were expected to provide an energy performance diagnosis (DPE). From 15 May to 31 December 2024, the requirement was waived for MaPrimeRénov' single-action renovation requests in mainland France.¹²¹

The flat-rate assistance is granted depending on the precise nature of the work to be carried out and the income. For households with very modest incomes: the flat-rate aid is between €1,200 and €11,000 depending on the work to be carried out. For households with modest incomes: the flat-rate aid is between €800 and €9,000 depending on the work to be carried out. For middle-

¹¹⁹ France, Ministry of Economy (*Ministère de l'économie*)(2024), « MaPrimeRénov': The Grant for Energy Renovation » ("*MaPrimeRénov': la prime pour la rénovation énergétique*"), June 2024.

¹²⁰ France, Ministry of Economy (*Ministère de l'économie*)(2024), « MaPrimeRénov': The Grant for Energy Renovation » ("*MaPrimeRénov': la prime pour la rénovation énergétique*"), June 2024.

¹²¹ France, Ministry of Economy (*Ministère de l'économie*)(2024), « MaPrimeRénov': The Grant for Energy Renovation » ("*MaPrimeRénov': la prime pour la rénovation énergétique*"), June 2024.

income households: the flat-rate aid is between €400 and €6,000 depending on the work to be carried out.

- MaPrimeRénov' "*Parcours accompagné*", for large-scale works providing an increase of at least two energy classes.

It is available to owner occupants, lessor owners with middle and upper incomes from 1 January 2024 and all lessor owners from 1 July 2024, usufructuary, holders (occupants and lessors) of a real right conferring the use of the property, lessees (occupants and lessors) of a long lease or a construction lease, owners in joint ownership, if all the joint owners have signed the sworn certificate which designates the applicant to carry out the work on behalf of the joint ownership.¹²²

In order to benefit from MaPrimeRénov' "*Parcours accompagné*" assistance, the accommodation must be: in mainland France occupied as a main residence (at least eight months per year) for a period of at least three years from the date of request for the balance of the assistance; a home built at least 15 years ago, regardless of its energy label. Landlords must solemnly swear to rent their property as their main residence for a period of at least six years and within one year following the request for the incentive.¹²³

This component finances up to 90% of the cost of the work for a large-scale renovation.

-MaPrimeRénov' "*Copropriété*", for the renovation of common areas in co-ownership and for work of collective interest in private areas.

It is available if the co-ownership meets certain criteria: in order to be eligible, the co-ownership must own at least 75% of the lots (the percentage is reduced to 65% for co-

¹²² France, Ministry of Economy (*Ministère de l'économie*)(2024), MaPrimeRénov' Guided Path: Everything You Need to Know About This Aid ("*MaPrimeRénov' Parcours accompagné : tout savoir sur cette aide*"), July 2024.

¹²³ France, Ministry of Economy (*Ministère de l'économie*)(2024), MaPrimeRénov' Guided Path: Everything You Need to Know About This Aid ("*MaPrimeRénov' Parcours accompagné : tout savoir sur cette aide*"), July 2024.

	<p>ownerships of 20 lots or less) or failing that, shares dedicated to main residential use; it must have been built at least 15 years ago; it must have been registered and updated annually in the national register of co-ownerships.¹²⁴</p> <p>This component finances 30% or 45% of the cost of the work depending on the ambition of the energy renovation, within a ceiling of €25,000 per accommodation: 30% for renovation work providing an energy gain of at least 35%, 45% for an energy renovation allowing an energy gain of at least 50%.</p> <p>At the end of 2020, more than 190,000 requests for aid had been submitted, including 140,000 granted by ANAH. In 2021, 644,073 requests for aid were granted by ANAH.</p>
<p>Internal governance</p> <p><i>Please include:</i></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>The energy transition subsidy, known as MaPrimeRénov', was created by Finance law No. 2019-1479 for 2020 and implemented by Decree No. 2020-26 of 14 January 2020.</p> <p>From 1 January 2024, the amended Order of 17 November 2020 sets out the technical characteristics and procedures for carrying out the work and services which expenditure is eligible for the energy transition subsidy. Decree No. 2024-249 of 21 March 2024 and a Decree of 21 March 2024 amended the MaPrimeRénov' award procedures between 15 May and 31 December 2024.</p> <p>Participatory structures: French Ministry of Ecological Transition, National housing agency (<i>Agence nationale de l'habitat</i> - ANAH). MaPrimeRénov' is paid by the ANAH.</p> <p>The Ministry of Ecological Transition is responsible for designing the MaPrimeRénov' aid programme.</p>

¹²⁴ France, Ministry of Economy (*Ministère de l'économie*)(2024), "MaPrimeRénov' Copropriété: Everything You Need to Know About This Aid for Renovating Common Areas in Your Condominium" ("*MaPrimeRénov' Copropriété: tout savoir sur cette aide pour rénover les parties communes de votre copropriété*"), April 2024.

	<p>The National Housing Agency (<i>Agence nationale de l'habitat</i> - ANAH) is the authority responsible for processing MaPrimeRénov' aid applications. ANAH is a public administrative establishment of the State placed under the supervision of four ministries, namely those responsible for the economy, public accounts, housing and since 2021 energy (Article R. 321-1 of the construction and housing code). The Agency has nearly 300 agents divided into 7 departments, 2 poles and a general secretariat for strategic management which allow it to carry out its missions on a daily basis. Its headquarters are located in Paris. MaPrimeRénov' is paid by the ANAH.</p> <p>A committee has been set up to monitor the implementation of all aspects of the energy renovation program. It includes people qualified in the energy renovation field. It meets at the request of the French Minister for Ecological Transition and Regional Cohesion, the Minister for Energy Transition, and the French Minister Delegate to the Minister for Ecological Transition and Regional Cohesion, responsible for Housing.</p>
<p>External governance</p> <p><i>Please include:</i></p> <ul style="list-style-type: none"> • Reporting obligations • Accountability • Partnerships • Collaborations 	<p>Between 2021 and 2023, the European Union funded 70% of the MaPrimeRénov' programme as part of the recovery plan. This amounts to €1.404 billion for the energy renovation of 700,000 homes. France will continue to receive European funding in 2024 and 2025.</p> <p>There are ex-post inspections carried out by European inspectors to ensure that the renovation has indeed achieved the promised energy savings.</p>
<p>Funds</p> <p><i>Please include:</i></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>MaPrimeRénov' is financed by the French government on credits from the Ministry of Energy Transition. Its implementation is based on a total budget of €3 billion per year. Its budget was increased in 2024 to reach €4 billion in total.</p>

Other aspects to be considered	
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