

L'UNION SOCIALE POUR L'HABITAT

16 May 2011

European Economic Recovery Plan

COM(2008) 800 Final

Measure n°6: Improving energy efficiency in buildings Reprogramming regional Structural Fund operational programmes to prioritise social housing

2009-2011 MID-TERM ASSESSMENT - FRANCE

Report for José Manuel Durão Barroso President of the European Commission

Dear Mr. President,

On 28th November 2008, you put forward to the Council and the Parliament the notion of adopting a European Economic Recovery Plan aimed at coordinating the actions of the Union and its Member States in light of the economic and financial crisis. With this in mind, you called upon its Member States to reprogramme their regional Structural Fund operational programmes so as to prioritise the thermal renovation of social housing.

This review of the ERDF Regulation that we were hoping for resulted in the involvement of all players concerned in France and the effective reprogramming of the ERDF at regional level.

Influencing the heating charges of households with modest incomes through support for investment in energy performance in social housing means acting against fuel poverty and helping to improve purchasing power. It also means acting to encourage local development and employment whilst fighting climate change and moving forward together to achieve the Europe 2020 objectives.

Given that Europe will be judged on these results both in the field and in relation to its citizens, I have personally insisted that the HLM Movement act to ensure the effective implementation of your proposal and the monitoring thereof at regional level in order to assess the practical effects on households and territories.

At a time when you are reflecting on the priorities of the future 2013-2020 cohesion policy and the content of the future ERDF Regulation, I am proud and pleased to share with you the conclusions of our mid-term assessment report as well as our practical proposals for shaping the future.

The European Union must be in a position to achieve concrete results for its citizens. In less than 22 months, your proposal has generated over a billion euros in investment in energy performance in social housing in France alone and has helped to create and maintain 15,000 local jobs. 50,000 households with modest incomes will benefit from your measure in practical terms through a noticeable reduction in their heating costs thanks to its undisputed leveraging effect. This, then, fully complies with this requirement for concrete results since it focuses the actions of public authorities on intelligent investment, namely investment in energy efficiency in social housing in order to create local jobs, save energy and fight exclusion and poverty.

Furthermore, I am sure that you will be attentive to the results of our mid-term assessment as well as our proposals outlined with a view to the general implementation of your measure across all Member States in accordance with the Europe 2020 strategy objectives.

Thierry Repentin President of the Union Sociale pour l'Habitat, Senator for Savoie 16 May 2011

1. INTRODUCTION

As part of the implementation of the European Economic Recovery Plan, the Member States and institutions of the EU have been encouraged to take steps towards improving energy efficiency in buildings and in social housing in particular.

This being the case, France established a set of demanding objectives to ensure that its housing complied with the highest of European standards and that it was continuously subjected to energy certification.

As was also suggested by the European Economic Recovery Plan, the French regions significantly reprogrammed their Structural Fund operational programmes in order to commit a larger share of the ERDF to investment relating to energy efficiency in social housing and the development of renewable energy sources.

In accordance with the revised ERDF Regulation, a maximum envelope of 320 million euros was allocated for France, including 230 million for the 22 metropolitan regions and 90 million euros for the overseas territories and departments. Social housing thermal renovation projects eligible for ERDF funding in France must '*target those buildings which consume the most energy, be exemplary, and have a ripple effect whilst benefiting a large amount of housing and a large number of households*' according to the ministerial implementation circular dated 22nd June 2009.

Given the issues at stake and the need to prevent the crisis from spiralling out of control, this reprogramming took place in record time, as did the adoption of this measure by regional players and operators in the field of social housing. 22 months after this reprogramming in the French metropolitan regions, 97% of the programmed ERDF envelope has been effectively allocated¹ but many investment projects are still awaiting appraisal and/or a decision regarding any potential overruns in the notified regional envelopes. A second programming cycle is underway in certain regions but many of them have already reached the maximum threshold of 4% or have negotiated an excess within the 4% of the national ERDF envelope.

This maximum envelope will more than likely be reached before the end of 2011. It will not, therefore, enable all of the investment projects submitted by social housing bodies to be approved, nor will it maximise the impact of the measure on growth, local employment and climate change. The risk of a break in programming and its impact on the local employment dynamic will need to be dealt with.

In accordance with the ERDF Regulation, the French State has recommended that regional authorities use the national cap of 4% as a baseline in relation to regional operational programmes and to refer to the DATAR, responsible for the coordination of regional policy, in the event of this cap being exceeded. This being the case, 14 of the 22 regions decided to devote the entire envelope of 4% to improving energy efficiency in social housing. 5 regions went on to increase the initially planned envelope within the 4% cap (Brittany, Centre, Champagne-Ardenne, Limousin and Provence-Alpes-Côte d'Azur) and 2 regions, namely Ile-de-France and Nord-Pas-de-Calais applied to the DATAR for an increase in the regional 4% cap of some 67% for the Ile-de-France region and 43% for Nord-Pas-de-Calais. Both of these regions, which are highly urbanised and have a high level of social housing, are experiencing

¹ Based on our monitoring of the metropolitan regions excluding overseas regions (cf. attached report).

great needs in this field, despite the relatively low level of ERDF funding they have been allocated.

Since the launch of the reprogramming operation, the Union Sociale pour l'Habitat (USH, 'Social Housing Association') and the Fédération Nationale des Associations Régionales HLM (FNARHLM, 'National Federation of Regional Associations of organisations involved in social housing') have been continuously monitoring the implementation of this measure in the French regions for the purposes of assessing its impact both on the development of energy performance levels in the social housing concerned and on territorial development.

With this in mind, the *Union Sociale pour l'Habitat* and 6 regional HLM associations took part to an hearing at the European Parliament on 9th December 2010 at the instigation of Deputy Karima Delli (a member of the French Green Party) on the conditions of implementation of this measure in France as well as by the Coordination Committee of the Funds (COCOF) at the request of the European Commission (DG Regio).

This continuous monitoring enables them to perform an initial mid-term assessment of this measure with regards to the short-term objectives of the European Economic Recovery Plan as well as more structural environmental, social and territorial objectives which will also contribute to the implementation of the Europe 2020 strategy.

The situation in each of the French regions is outlined in an appendix to the present report by means of a series of regional monitoring sheets.

Reprogramming of regional operational programmes Reminder of the implementation schedule

28th November 2008: the Commission adopts the European Economic Recovery Plan, resulting in the revision of the ERDF Regulation for the purposes of prioritising the thermal renovation of social housing.

19th December 2008: the European Council adopts the amended Recovery Plan. At the request of the new Member States, the Council expands this proposal to all housing but imposes a cap of 4% of the national ERDF envelope (i.e. 8 billion euros for the EU-27) in reference to a social cohesion objective.

2nd April 2009: the European Parliament adopts the measure (627 votes for, 17 against).

21st May 2009: the measure is published in the OJEU

 10^{th} June 2009: the revised ERDF Regulation comes into force

22nd June 2009: the Ministry for Ecology, Energy, Sustainable Development and Spatial Planning (MEEDAT) issues a circular calling for regions to reprogramme their operational programmes

 31^{st} March 2011: over 97% of the allocated envelope is used for thermal renovation, with 50,000 households ultimately benefiting

2. MID-TERM MEASURE CONSUMPTION STATEMENT

By 31st March 2011, i.e. only 22 months after the measure came into force in France, 208.5 million euros, a total of 97% of the maximum ERDF envelope allocated for regions excluding overseas regions, have been reprogrammed and allocated to investment projects in the field of energy efficiency in social housing.

Of the 208.5 million euros programmed, 146 million had been definitively allocated whilst the remainder was still under appraisal. The average support provided by the ERDF amounts to 2,886 euros per dwelling, giving an average of 14% of the total amount of investment required for the project.

In many regions, dossiers are still awaiting appraisal due to the envelope cap. The value of dossiers on the waiting list is estimated at around 15 million ERDF euros for a potential investment, currently frozen until 2013, of 103 million euros. Based on the ratios observed in the regions and the maximum permitted envelope of 320 million euros, the measure could potentially affect 110 400 households, for a total investment of 2,2 billion euros and with the creation of 31 000 jobs.

3. COUNTERCYCLICAL ASPECT OF THE MEASURE IN THE TERRITORIES

The countercyclical element of the measure is particularly significant. The measure has had a fast, positive and substantial effect on the local economy and employment. It complements the action of automatic stabilisers and has provided a practical response to the crisis in the form of a leveraging effect and a particularly high level of investment in the territories.

With regards to French overseas regions, ERDF-selected projects as at 1st March 2011 stood at a **total investment of 1.013 billion euros** in property and thermal renovation works, i.e. **7 times the committed ERDF envelope**. ERDF therefore performed its role as a lever in the setting-up of national joint-financing initiatives by project initiators and the effective funding of intelligent investment projects involving social housing organisations to the full. In addition to the Eco-loan from the *Caisse des Dépôts et Consignations* and the aid from the ADEME (French Environment and Energy Management Agency), national contributions come primarily from rallying local and regional authorities and notably regional councils.

Based on the generally recognised ratios of jobs created/ investment², it is estimated that **15000 local jobs have been created** by the work generated by ERDF-selected property-related thermal renovation investment projects.

The majority of social housing organisations call upon local tradesmen and local SMEs for this type of property-related thermal renovation. This is consequently work which cannot be relocated, primarily SMEs operating in the building, joinery, plumbing, heating, insulation, etc. sectors. This, in turn, contributes to the structuring of local subsidiaries in the propertyrelated thermal renovation sector. The stabilisation of such subsidiaries and their grounding in

² For 1 million euros of investment in property-related thermal renovation, 14.2 jobs created in the field of energy performance-related work according to the MEEDDAT (Ministry for Ecology, Energy, Sustainable Development and Spatial Planning) based on the 2006 EAE.

the development of green jobs in the territory in question will depend on the continuity of programming.

Finally, the decrease in heating costs for beneficiary households, **an estimated average decrease of around 40%**, helps maintain their purchasing power and boost internal demand. Accommodation and heating costs account for the largest part of household expenditure. A significant decrease in heating costs can have a considerable impact on the ability of beneficiary households to spend the money alternatively on locally-provided goods and services. With the average reduction in heating costs ranging from 30 to 90 euros a month depending on the size of the dwelling, the annual increase in terms of purchasing power could potentially reach **360 to 1,000 euros per household**. Bearing in mind that there were 50,000 households benefiting from the measure as at 31st March 2011, the increase in purchasing power can be estimated at between **18 and 54 million euros a year**.

4. CLIMATIC ASPECT OF THE MEASURE

The leveraging effect of the ERDF as a result of the raising of additional funds enables operators in the field of social housing to develop investment projects which are more ambitious in terms of requirements and energy performance levels. A third of investment projects aim to achieve 'Low Energy Consumption Building' certification (classes A and B), whereby **consumption levels are below 80Kwh/m²/year**. Following a survey of the energy ratings awarded to ERDF-selected projects both before and after thermal renovation works, it was noted that the highest energy-consuming social dwellings, namely those falling into classes E, F and G, were virtually non-existent. This major leap forward is a result of the reprogramming initiative since we have progressed from 1% of social dwellings having ratings of A, B or C to over 80%. Regional practices relating to the adjustment of the ERDF subsidy rate according to the target energy performance level were a crucial factor in this measure, i.e. an average of **over 2,200 social dwellings a month**. The ERDF and national joint-financing initiatives thus help accelerate the progression towards a low-carbon-

producing economy whilst lowering Europe's dependence on energy imports and keeping the energy bills of households with modest incomes under control.

Categories		performance of benefici ellings before ERDF pro	Energy performance of beneficiary social dwellings after ERDF project					
More efficient	_	_		_	_			
	Α	0%		Α	15%	6		
B	В	0%		В		31%		
c	C	4%		c			52%	
D	D	25%		D	2%			
E	EFG		71%	EFG	0%			
Financial and a second second								
G								
Less efficient		-		-	_			

5. SOCIAL ASPECT AND FIGHTING ENERGY INSTABILITY

As at 31st March 2011, a total of **50,606 households with modest incomes** had benefited or would be benefiting from the support of the ERDF in the form of the thermal renovation of their rented accommodation. Based on a consistent rate of programming, over **100,000 households** will receive support from the European Union by 31st December 2012. In light of the savings in heating costs that will result from such work, this measure is therefore actively contributing to fighting fuel poverty, on the one hand, and to increasing the purchasing power of households with modest incomes living in social housing (cf. point 1) on the other.

The European Union can therefore take practical steps regarding the heating costs of households with modest incomes through the energy performance of social housing and take active steps against fuel poverty by enhancing their purchasing power whilst remaining attentive to the needs expressed by the families and populations concerned. This being the case, the measure puts the European Union in a position whereby it is able to achieve concrete results for its citizens and to target the fields that directly affect them in their daily lives, primarily housing and heating, which account for the largest part of their expenditure.

Above and beyond the issue of citizen support for the European project, there is reason to develop an ambitious communications campaign regarding Europe's commitment to notably improving the living conditions of its poorest citizens.

6. INITIAL CONCLUSIONS OF THE MID-TERM ASSESSMENT

It is clear from this initial mid-term assessment that the revision of the ERDF Regulation in favour of investment in the thermal renovation of social housing has actively contributed to the implementation of the European Economic Recovery Plan, despite the cap of 4% of the national ERDF envelope and the reprogramming operation which took place mid-way through the year (mid-2009). These conditions of implementation combined their effects in terms of their limited adoption by the Members States as a whole.

In France, meanwhile, the measure has proven effective in terms of creating and maintaining jobs at a local level, supporting the purchasing power of households with modest incomes, fighting fuel poverty and even making a significant contribution to combating climate change. The measure is an integral and long-term part of achieving the longer-term objectives of the Europe 2020 strategy.

The table below outlines the main indicators of this measure. Based on the average ratios observed in the French regions, it forecasts its potential with regards to the EU-27 were the measure to be applied across all Member States.

		EU-27		
Indicators	06/2009- 03/2011 actual	04/2011- 12/2012 potential	Potential total 06/2009-31/122012	2009/2012 potential based on FR ratios
4% ERDF envelope	€320 million	€320 million	€320 million	€8 billion
Programmed envelope	€208.2 million (65%)	€111.8 million (balance to be programmed)	-	-
Envelope committed	€146 million (70%)	-	-	-
Investment generated average ERDF funding of 14% observed across 21 regions	€1.013 billion	+ €771 million	€.2 billion	€5,2 billion
Local jobs created (X 14.2) based on MEEDDAT statistics	14,393	10,954	31,353	783,000
Beneficiary households Renovated dwellings	50,606	38,571	110 ,400	2.76 million

The following dashboard for monitoring regional operational programmes shows the great differences in regional situations and the ability of the ERDF to adapt to said situations.

Regional programming dashboard (as at 31st March 2011) French regions excluding Corsica and overseas departments

TOTAL	215,5	173,3	35,2	208,5	97%	75,62	70,43	146,05 70,05%	50 606	1013,6	14%	14 393	2 886
Rhone Alpes	13	12,9	0	12,9	99%	12,90	0,00	12,90	3 500	87,0	15%	1 235	3 686
PACA	12	7,1	2,5	9,6	80%	7,10	0,00	7,10	1 924	58,1	12%	825	3 690
Poitou Charentes	8	8	0	8	100%	0,58	8,60	9,18	2 603	68,2	13%	968	3 527
Picardie	8	8	0	8	100%	0,76	0,00	0,76	410	8,4	9%	119	1 841
Pays de la Loire	12	12	0	12	100%	1,29	1,90	3,19	1 538	55,2	6%	784	2 074
Nord pas de Calais	28	20	20	40	143%	2,40	17,90	20,30	4 502	206,0	10%	2 925	4 509
Midi Pyrennées	17,2	17,2	0	17,2	100%	0,33	8,00	8,33	3 619	49,0	17%	696	2 302
Lorraine	13,2	13,2	0	13,2	100%	4,90	9,90	14,80	5 392	40,9	36%	581	2 745
Limousin	5	1	1	2	40%	0,41	1,15	1,56	1 558	22,5	7%	320	1 001
Languedoc Roussillon	10,8	10,8	0	10,8	100%	5,70	2,70	8,40	2 390	28,2	30%	400	3 515
lle de France	6	6	4	10	167%	10,00	0,00	10,00	3 953	40,6	25%	577	2 530
Haute Normandie	8,8	8	0	8	91%	7,40	0,00	7,40	2 069	29,3	25%	416	3 577
Franche Comté	5,8	5,8	0	5,8	100%	2,90	0,88	3,78	1 037	29,8	13%	423	3 646
Champagne Ardenne	7,5	1,8	1	2,8	37%	2,20	0,00	2,20	2 297	47,7	5%	677	958
Centre	7,8	4	1	5	64%	2,20	1,60	3,80	1 516	17,2	22%	244	2 507
Bretagne	12	5	5,7	10,7	89%	4,30	0,00	4,30	2 103	53,5	8%	760	2 045
Normandie Bourgogne	7,4	4,5	0	4,5	61%	0,74	6,00	6,74	2 302	55,5	12%	788	2 929
Basse	7	6	0	6	86%	0,00	2,00	2,00	650	16,6	12%	236	3 077
Aquitaine Auvergne	8	4	0	4	50%	1,68	0.00	1,68	448	13,5	12%	192	3 750
Alsace	15	15	0	15	100%	6,80	9,80	16,60	5 677	79,8	21%	1 133	2 924
Al	M euros	initial M euros	additionnel M euros	3	régionale des 4%	M euros FEDER 1,03	M euros FEDER 0,00	1,03	concernés	M euros	FEDER/ invests	94	euros 921
FEDER	4% de l'enveloppe	Programme	Programme logement	Total M euros	% de l'enveloppe	Projets engagés	Projets en instruction	Total M euros	Ménages / logements	Invests aénérés	Effet de levier	Emplois induits	FEDER / logement

7. CONTINUING TO INVEST IN THE FUTURE: OUR PROPOSALS FOR 2013-2020

The European Union must take full advantage of this measure, which had in fact been introduced during programming and capped at 4% of the ERDF envelope. Despite these two major handicaps, which have limited its adoption among Member States and players, the measure has responded fully to the combined objectives set in France. It has exceeded expectations where its clear and practical actions towards citizens are concerned but at the cost of a great deal of effort on the part of the HLM Movement at European, national and above all regional levels.

The measure has also evoked a great deal of interest among all regional partners called upon by regional HLM (public housing) associations, public authorities, operators and representatives of beneficiary households. It must now be made sustainable in order to guarantee the continuity of its structuring effect on economic recovery and growth, development and local employment, climate change and the fight against fuel poverty and poverty in general.

However, it now needs to be implemented on another scale, eliminating the handicaps of youth clearly identified for the new 2013-2020 programming period so as to guarantee the full involvement of all Member States for the good of both the people and the growth of the European Union.

The measure must therefore be **extended** for the entire 2013-2020 programming period from the time it comes into force on 1st January 2013. Having already proven itself, it must now be **uncapped** so as to more effectively respond to the actual needs of Member States and regional territories in terms of energy performance in social housing. This lifting of the cap will consequently release the potential for the sustainable, intelligent and inclusive growth of the European Union held by such clear action towards the poorest European citizens.

The 6 operational proposals of the HLM Movement for 2013-2020

- 1- To prevent a break in programming between the end of the current period and the start of the next programming period (2012-2013).
- 2- To bring the experimental period whereby the cap is set at 4% of the national ERDF envelope to a close and release its growth potential.
- 3- To provide European regions with suitable and flexible funding tools in order to ensure the long-term effectiveness of the measure.
- 4- To support specific regional coordination and communication programmes and teach households how to optimise their heating expenditure reduction potential.
- 5- To reduce administrative and regulatory charges imposed upon intelligent investment project initiators.
- 6- To create a European fund devoted to energy performance in housing.

1. To prevent a break in programming between the end of the current period and the start of the next programming period (2012-2013). By the end of 2011, the ERDF envelope

of 4% will have been entirely programmed, as is already the case for 9 regions, with projects on the waiting list due to lack of available funding. We consider it important that the European Commission be in a position to put forward a transitional measure in order to prevent the risk of a break in the continuity of programming in 2012 and 2013. This two-year break in programming would be particularly detrimental to the sustainability of jobs created at local level, to local subsidiaries created around the projects in question and to the continuous involvement of players at regional level. There must be the possibility of allocating, on a one-off basis and at the express request of the State in question, any ERDF envelopes which have not been utilised by a Member State to this measure of the European Economic Recovery Plan, with exemption from the 4% cap.

2. To bring the experimental period whereby the cap is set at 4% of the national ERDF envelope to a close and release its growth potential. The measure put forward by the Commission has proven its effectiveness across the territories in which it has been implemented in terms of local job creation, its leveraging effect on raising additional funds, fighting fuel poverty, supporting the purchasing power of poorer citizens and improving energy performance in beneficiary dwellings. The European Commission must learn every lesson it can from this exploratory measure and bring it into general application over the coming programming period without imposing a cap. When drafting their 2013-2020 national strategy, Member States must be able to outline their own needs in terms of the thermal renovation of housing and freely programme the national ERDF envelope they require, taking into account its active contribution to the objectives of the Europe 2020 strategy and its particular clarity where citizens are concerned. Lifting the cap on the ERDF envelope should enable intelligent investment project initiators to increase their energy performance objectives and target the most demanding levels of classification (classes A and B).

3. To provide European regions with suitable and flexible funding tools in order to ensure the long-term effectiveness of the measure. The ERDF must be able to adapt to the different territorial situations with which it will be faced and guarantee the optimum allocation of public resources in the long term. This being the case, we propose that, in addition to providing subsidies, it become a financial engineering tool so as to create a more sustainable mass effect across the different territories in the form of interest subsidies, dedicated guarantee funds or even revolving investment funds. It is important, too, that a conventional subsidy-type element continue to exist alongside this for projects with specific needs in terms of thermal requirements and subsidy flexibility. The decision of whether to allocate the ERDF in subsidy mode and/or financial engineering mode must remain the prerogative of the Member States, but the European Commission must actively encourage Member States to implement this measure which will shape the future and to optimise the future use thereof within the framework of the Europe 2020 strategy.

4. To support specific regional coordination and communication programmes and teach households how to optimise their heating expenditure reduction potential. The implementation of the revised ERDF Regulation in mid-2009 involved a great deal of effort on the part of the regional partners called upon by regional HLM associations and a significant amount of consultation between the various players involved, which included management authorities, regions, energy agencies and other co-financiers. This work is important in identifying regional needs, setting common ERDF access priorities and criteria and encouraging operators in the field of social housing to submit plans for intelligent investment projects. With regards to technical support, it is important that funding be made available for the implementation of **specific coordination schemes** in European regions for the purposes of promoting, monitoring and regularly assessing this measure. Technical

support must enable a **regional coordinator for the measure** to be appointed and the coordination of a **European network of such regional coordinators** must be supported by the European Commission where the COCOF is concerned. Such regional schemes must be incorporated into **an ambitious communications component** aimed at beneficiary households and the general public to highlight the positive and very practical role Europe can play in improving their living conditions. The ERDF, in conjunction with the ESF, must also incorporate a **training and support** component for beneficiary households in order to enable them to make the best possible use of their renovated dwelling in terms of effectively reducing their heating costs.

5. To reduce administrative and regulatory charges imposed upon intelligent investment project initiators. The administrative and regulatory charges involved in appraisal, control and particularly State aid control procedures prevent some degree of involvement on the part of investment project initiators. Indeed, many operators have stopped initiating investment projects as a result of the administrative red-tape involved in the procedures and the associated legal risks. The simplification of such procedures and controls must be a major focus of the reform of the cohesion policy in order to fully release the growth potential of the ERDF. The notion of a single subsidy request dossier (ERDF and national contributions) and a unification of energy performance criteria must be incorporated into the future Regulation. The State aid control regime applicable to energy investments in the field of social housing must be clarified and simplified, particularly for Member States in which social housing falls within the public service compensation regime as applicable to services of general economic interest. This regime is currently being reviewed before November 2011. The reasoning in terms of fair compensation for annual revenue subsidies relating to the notion of public service compensation is not necessarily relevant to appreciating the compatibility of State aid with investment in the social housing sector, primarily in terms of intelligent long-term investment in property-related thermal renovation.

6. To create a European fund devoted to energy efficiency in housing. The European Union has made some ambitious commitments in terms of reducing greenhouse gases, developing renewable energy sources and improving the energy efficiency of buildings. The building sector, particularly where housing is concerned, has the necessary potential to significantly contribute to achieving these objectives whilst consolidating local jobs and supporting the purchasing power of households. Alongside and in synergy with the ERDF, Europe could set up and supply a dedicated fund, notably by means of the European Investment Bank, for the purposes of achieving these objectives and giving operators access to the funds they need to invest in the thermal renovation of housing, irrespective of the territory in which they operate.

* * *

Studied carried out by Carine Puyol (USH) and Louise de Verneuil (FNAR), in conjunction with the regional HLM (public housing) associations, under the management of Laurent Ghékiere (USH)

> Union Sociale pour l'Habitat – EU office – May 2011 http://www.union-habitat.eu