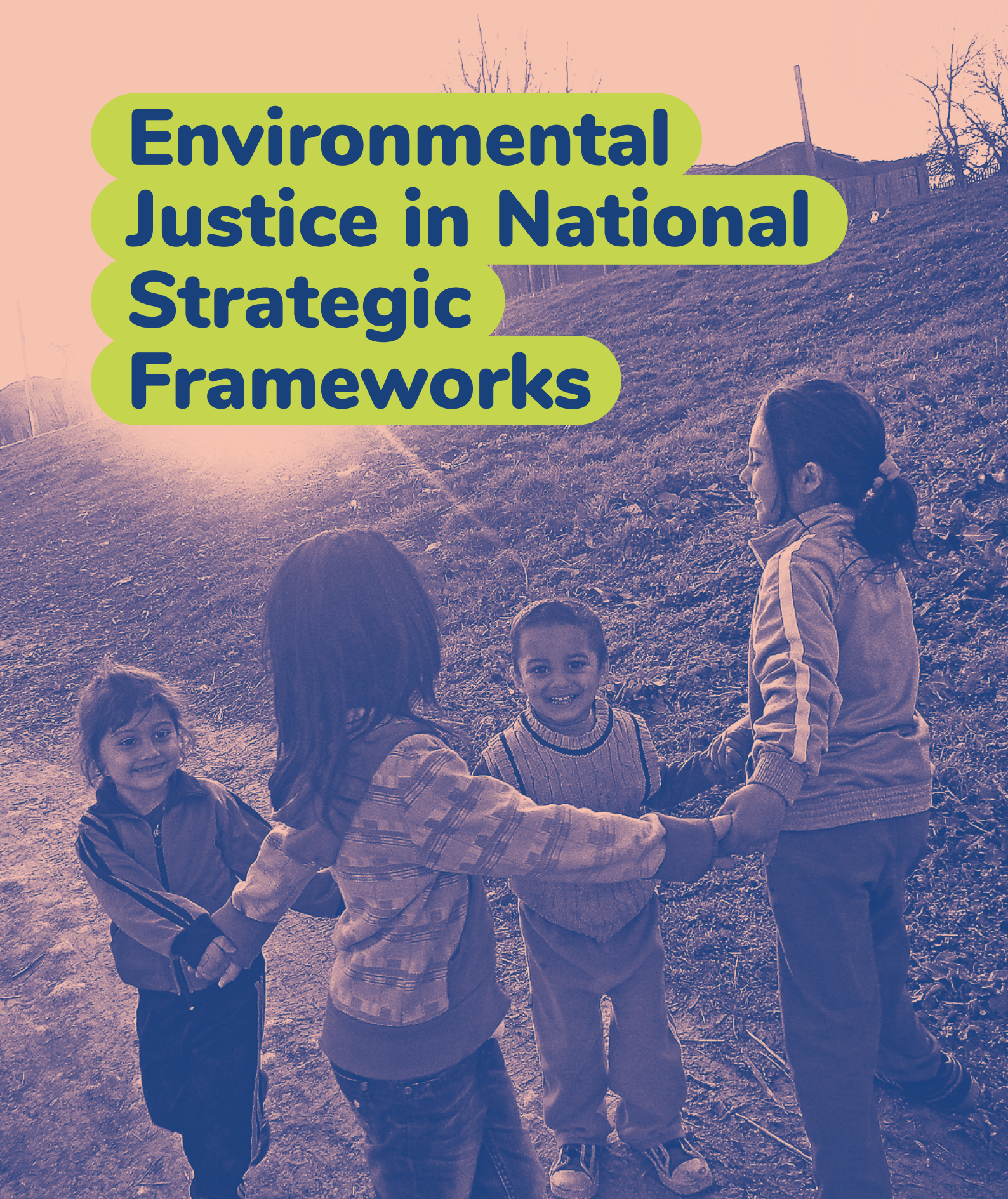


# Environmental Justice in National Strategic Frameworks



**EEB**  
European  
Environmental  
Bureau





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# Introduction

Throughout Europe, many Roma and Traveller communities have been living in extreme poverty and exposed to environmental hazards. Many Roma neighbourhoods are situated near landfills, waste disposal sites, and industrial zones, leading to heightened exposure to air and water pollution, along with associated health risks.<sup>1</sup> Discrimination in housing often results in overcrowded and substandard living conditions, while limited access to clean water and sanitation facilities can contribute to waterborne diseases. Additionally, inadequate access to green spaces, environmental displacement, and exclusion from decision-making processes further compound the environmental challenges faced by Roma and Traveller communities.

Until recently, both the European Union and its Member States had largely overlooked the presence of environmental racism impacting these communities. Roma inclusion was notably absent from EU environmental and climate policies and standards, as Member States generally failed to incorporate or reference the Roma and Traveller populations within these frameworks. The COVID-19 pandemic underscored the severity of environmental racism, as the pandemic disproportionately affected marginalized communities, which were particularly susceptible to infection and health-related challenges due to their lack of access to essential environmental services, such as clean water and proper waste disposal. The pandemic-induced disparity brought about the importance of directly tackling environmental racism.

In October 2020, the EU adopted its *EU Strategic Framework for Roma Equality, Inclusion and Participation* which acknowledged the pressing need for action on environmental justice, marking the first significant EU policy document to specifically address the topic. As a result, member states (with the exception of Malta, because there is no Roma community of significance that would merit a separate inclusion policy approach) had to develop and implement National Roma Integration Strategies (NRIS) to address the social inclusion and equal treatment of Roma communities, focusing on areas such as education, employment, healthcare, and housing.

This policy analysis aims to provide an overview of the way in which environmental justice is addressed by Member States in the national Roma strategic frameworks and the progress governments have made so far therein. In this respect the assessment looks not only at environmental justice aspects but also its proxies such as access to housing and or basic utilities (water, sanitation etc.), especially in situations where strategies do not frame environmental justice as such. In addition, the report also highlights good practices and examples at national level, where they exist and provides a number of considerations and recommendations to Member States to consider when implementing or revising their national Roma strategies. Finally, this analysis should serve as a starting point for deeper discussions amongst stakeholders, including civil society and government representatives about the risks and impact of environmental racism and discrimination in regard to Roma and Traveller communities.



## Policy context

In 2019, the European Environmental Bureau (EEB) and the European Roma Grassroots Organisations Network (ERGO) in cooperation with the Environmental Science and Technology Institute at the Universitat Autònoma de Barcelona (ICTA) produced a first joint report on environmental racism against Roma in Central and Eastern Europe, titled **Pushed to the wastelands: Environmental racism against Roma communities in Central and Eastern Europe**<sup>2</sup>.

The report illustrates how environmental racism against Roma communities is structural and interlinked with other dimensions of racially motivated discrimination and exclusion. The research highlights five European countries with the highest proportion of Roma (Hungary, Slovakia, Bulgaria, Romania and North Macedonia) where most of the affected population is disproportionately Roma, and where adjacent villages, towns, or neighbourhoods are comparatively less or not at all affected by the described impact. The report uses the Environmental Justice Atlas (EJAtlas)<sup>3</sup> to map, systematise and analyse 32 cases of environmental racism against Roma communities in Slovakia, Hungary, Romania, Bulgaria and North Macedonia.

The main findings of the report highlight the disconnection or non-provision of public environmental services, whereby Roma are denied or have limited access to water, inadequate sanitation and/or waste collection. The structural antigypsyism Roma suffer, leaves them with no other choice than to live in environmentally degraded and polluted sites including landfills, contaminated industrial sites, such as mining complexes and smelters or former military bases, or in areas prone to environmental hazards, such as floods. More disturbingly, in some cases, Roma communities are subjected to forced evictions from land, water resources or places with high economic value to degraded land areas or landfills in order to make place for new housing or tourism facilities.

## What is environmental justice and why it's important in the context of Roma inclusion?

According to EEB<sup>4</sup>, environmental justice relates to how certain communities and groups, including people of colour, ethnic minorities, indigenous groups or low-income groups, are disproportionately affected by environmental burdens, have less access to environmental resources and services, and/or are discriminated against in their right to information, to participation in decision-making and to access to justice in environmental matters.

On the other hand, environmental racism<sup>5</sup> specifically focuses on the discriminatory practices and policies that lead to the disproportionate exposure of minority and marginalized communities, often predominantly people of colour, to environmental hazards and pollution. The concept highlights the systemic and intentional inequities in the siting of toxic facilities, pollution, and the lack of access to essential environmental resources and services in these communities. Environmental racism draws attention to the historical and ongoing injustices that result in environmental burdens being unfairly shouldered by marginalised populations, contributing to health disparities and reduced quality of life.<sup>6</sup> Today, environmental racism remains a pervasive issue that affects communities all over the world and addressing environmental racism requires a multifaceted approach that tackles the underlying social, economic, and political factors that contribute to its persistence. In the context Roma and Traveller communities, environmental racism is understood as one manifestation of antigypsyism, that is, situations in which members of Roma or other communities who are stigmatized as 'gypsies' are disproportionately affected by environmental burdens and/or are denied equal access to environmental resources and services.

In Europe, the acknowledgment of environmental justice and how minorities and low-income groups are disproportionately affected by environmental burdens has developed at a slower pace than in North and South America. A 2018 report published by the European Environmental Agency (EEA)<sup>7</sup> drew attention to the close links between social and environmental problems and their impact on health. While the report is an important reference



for environmental justice discourse in the EU, it does not assess how ethnic minorities, such as the Roma, are disproportionately affected by environmental burdens. It focuses on discrimination based on levels of income, unemployment, education and age across Europe. In recent years, interest in and research on environmental justice in Central and Eastern Europe with a focus on Roma communities has grown and has been able to show that racism plays a role in the distribution of environmental harms and benefits.<sup>8</sup>

## **EU Strategic Framework for Roma Equality, Inclusion and Participation and environmental justice**

In 2011, the EU adopted the first comprehensive framework policy on Roma inclusion in four main sectors, including education, employment, health, and housing. The aim was to encourage Member States to use the framework as a basis for developing national Roma strategies up to 2020.<sup>9</sup> After the assessment of the impact of this first EU Roma policy framework, the EU adopted the *EU Strategic Framework for Roma Equality, Inclusion and Participation*, which was a more far-reaching and multi-dimensional EU framework. The 2020 framework is built on the three pillars of equality, inclusion, and participation for Roma.

The European Commission introduced environmental justice as part of the guidelines to Member States, asking them, when drafting their national Roma strategic frameworks, to recognise and tackle environmental discrimination as it affects marginalised Roma communities in segregated areas (as a manifestation of antigypsyism). This marked a pivotal moment for the environmental justice movement within the EU, being the first document to officially acknowledge the connection between racial discrimination and the environmental challenges faced by Roma communities. It laid the groundwork for understanding how environmental injustices contribute to the marginalized living conditions of the Roma, including inadequate access to vital services like water, sanitation, waste management, and combating spatial segregation in housing. Additionally, it addressed the lack of green spaces for recreational purposes, the mitigation of environmental health risks due to pollution, and the necessity to ensure occupational safety for those enduring unfavourable environmental conditions.

Following the adoption of the new EU Roma Strategic Framework for Equality, Inclusion and Participation in 2020<sup>10</sup>, the EU Council adopted a related Recommendation on Roma equality, inclusion and participation 2021/C93/01<sup>11</sup>, which includes under the objective “Access to adequate desegregated housing and essential services” a set of relevant measures to address environmental justice, including: “to ensure access to essential services – such as tap water, safe and clean drinking





water (22), adequate sanitation, waste collection and management services, environmental services, electricity, gas, transport, financial services and digital communications – and physical infrastructure, by safeguarding continuity of basic utility services, both under normal conditions and during pandemics, ecological catastrophes and other crises”; measures to “combat any spatial segregation and promote desegregation”, “measures to support and strengthen the public authorities generally responsible for housing, essential services and environmental standards” and “measures to improve the living conditions of Roma people, to prevent and to tackle the negative health impact of exposure to pollution and contamination.

According to the Communication from the European Commission in January 2023 assessing the adoption of the National Roma Strategic Frameworks<sup>12</sup>, several Member States include measures to improve access to essential services, in particular access to running water and, to some extent, measures to prevent and eradicate spatial segregation. Few strategies include both mainstream and targeted measures to facilitate access to social housing, while several strategies propose measures to carry out official procedures for urban and residential upgrading, encourage home ownership, and invest in infrastructure such as electricity, gas, running water, sewage and waste management, roads and access to transport.

In addition, combatting discrimination and antigypsyism, as obstacles to accessing housing, is only acknowledged by a few Member States and this is reflected even less in terms of concrete measures. Most strategies address insufficiently issues such as forced evictions, the lack of possibility for Roma to become property owners or to afford sustainable renting, or reducing household overcrowding gap.<sup>13</sup>

Most Member States (CZ, EL, ES, HU and SK) with a larger Roma population<sup>14</sup> have generally included desegregation initiatives at local level, while Bulgaria and Romania lack specific desegregation measures. In this area, most strategies plan the use of EU funding programmes, however they only exceptionally provide details in terms of funding allocation.

In its recommendations to Member States, the Commission<sup>15</sup> strongly encouraged the Member States to use EU funding (ESF+, ERDF, InvestEU and RRP) to improve the living conditions of marginalised Roma communities and of Roma living in low-income households at risk of poverty and social exclusion; and to provide mainstream social housing in non-segregated areas, accompanied by measures to foster access to mainstream education, employment, health and social care, and develop or update local actions and implement desegregation plans.



# Methodology

The aim of the report was to provide a brief overview of how environmental justice or housing and basic services are mentioned in National Roma Strategic Frameworks (hereinafter referred to as “Strategy”/”Strategies”), in line the Council Recommendation on Roma equality, inclusion and participation 2021/C93/01.<sup>16</sup> In addition, the report includes also input and references from the Roma Civil Monitoring<sup>17</sup> reports, as a credible source of information provided by national coalitions of civil society in 26 Member States, which are part of an EU funded project and led by a Consortium of reputable European Networks and organisations in the field of human rights and Roma inclusion.

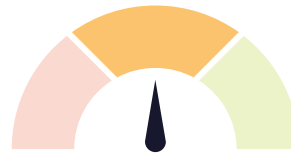
As Member States submitted their national Roma strategies by June 2022, while the first assessment by the Commission on the implementation process will only be published in 2024, this assessment is not able to look at the implementation process of the national Roma strategies and therefore at impact; it only focuses on the actual policy documents that the governments elaborated and adopted.

The report was done based on a desk assessment of the published national Roma strategies<sup>18</sup> submitted by national Roma Contact Points of the 26 Member States to the European Commission between September 2021 and June 2022<sup>19</sup>. Unfortunately, as the European Commission website includes only national strategies and not also action plans, this assessment is largely based on national Roma strategies only. This limits the extent to which the report showcases Member States’ performance in outlining their particularly specific measures and indicators – which are usually part of action plans.

The report provides a colour-based ranking of member States, based on the following distinctions:



**Green** – explicitly mentions environmental justice or the environment directly and has targets/indicators and a strategy on how to achieve targets.



**Yellow** – components of environmental justice, or the environment is either mentioned but not clear targets or strategy to address environmental justice OR environment is not mentioned but other sectors are mentioned which can achieve environmental justice such as housing, sanitary services, etc which address environmental injustices by proxy.



**Red** – no mention of the environment, no indicators or no mention of sanitary services, unclear on housing aspects, etc.

The ranking is not aimed at shaming Member States, but rather at increasing awareness on the level of progress made by governments in identifying and recognising environmental challenges and impacts on Roma and Traveller communities, where they exist. This assessment is also aimed at understanding how governments frame issues pertaining to environment, i.e. whether they are understood and framed strictly under housing and or basic utilities and other proxies or are connected to environmental racism or structural and institutional antigypsyism against Roma and Travellers.



The methodology of ranking countries by the extent to which they included environmental justice or environmental aspects and indicators within did not follow a very rigorous path, since even the countries that “scored” green did not fully comply with the definition of environmental justice provided within this report or environmental justice guidelines included under the EU Roma Framework. It is merely an exercise of “rewarding” countries for their efforts to consider environmental issues in connection to Roma inclusion, with the view to encourage more countries to address environmental justice in Roma and Traveller communities. In addition, where possible, the assessment identified and showcased good practices and examples in the area of housing or environmental justice (often by proxy).

Finally, the report includes final conclusions and recommendations to Member States with a view to encourage them to revise their national strategies to better reflect on environmental justice aspects within and to propose better fitted and more comprehensive measures and indicators considering various and inter-linked factors that have a disproportionate impact on Roma and Travellers from both an environmental and wellbeing perspectives, including by ensuring a direct connection between combatting antigypsyism and addressing the repercussions of environmental discrimination.



# Assessment of National Strategies for Roma Equality, Inclusion and Participation

## Main findings

Based on the assessment of the national Roma strategies, only five countries managed to introduce environmental aspects in their strategies, including **Croatia** (which includes a specific measure on the reduction of environmental and infrastructural inequalities in Roma communities (localities), **France** (which includes a specific measure on improving the environment and location of stopping areas under the second strategic objective of improving living and inclusion conditions for Travellers), **Hungary** (which includes a specific objective on Territorial inequalities, settlement development – housing and energy poverty – environmental awareness, environmental protection), **Slovenia** (which proposed the legalisation of Roma settlements through spatial planning) and **Spain** (which mentions environment regarding mainstreaming and alignment with the National Strategy against Energy Poverty). These four countries developed a rather complex and multi-layered understanding of environmental problems and their impact on the quality of living (housing conditions, health status, access to infrastructure and opportunities more broadly) of Roma and Traveller communities as well as their legal obligation to prevent pollution and health risks. To what extent these strategies will be met by political will and be implemented in practice, remains yet to be seen, especially that civil society have voiced concerns over the realisation of some of these objectives and measures.

In the context of numerous Member States, environmental considerations are indirectly addressed within the realms of housing and access to basic services. However, the explicit mention or targeted pursuit of environmental goals is often absent from these strategies. This gap in environmental focus may stem from a broader lack of awareness regarding the necessity to specifically address and combat environmental justice and inequalities. These inequalities are often rooted in manifestations of antigypsyism, which contribute to residential segregation marked by perilous living conditions. This segregation results in limited access to fundamental necessities such as drinking water, sanitation, and garbage collection.





The repercussions extend beyond housing, impacting the health of marginalized Roma and Traveller communities. Precarious living conditions, coupled with environmental hazards, contribute to deteriorating health conditions. This, in turn, leads to higher rates of illnesses, including asthma and cancer, and results in a lower life expectancy. Despite these significant environmental challenges, many national strategies fall short in recognizing and addressing the specific environmental dimensions of antigypsyism and the subsequent inequalities faced by Roma and Traveller communities. As such, most national strategies target symptoms rather than root causes of environmental racism which leads to environmental injustices.

Only three countries have been identified as lacking environmental aspects included in national strategies, both through a specific mentioning or proxy. As such, the Austrian Strategy does not mention environment nor specific measures targeted at Roma in the areas of housing, or sanitary services relevant to environmental justice, while the Estonian example does not include even a Roma Strategy per se, but only a few specific measures in education and employment under the wider 'Coheúsiue Estonia Strategy 2030'. Lastly, the Lithuanian Strategy is a brief document, including general provisions on education and employment, but not on health and housing and no specific measures or indicators that would address environmental justice are included.



# Country assessments

## AUSTRIA



**THE ONGOING STRATEGY DOES NOT MENTION ENVIRONMENTAL JUSTICE, THE ENVIRONMENT OR SPECIFIC MEASURES TARGETED AT ROMA IN THE AREAS OF HOUSING OR SANITARY SERVICES RELEVANT TO ENVIRONMENTAL JUSTICE.**

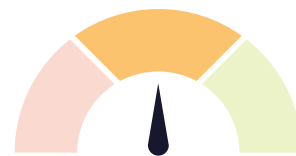
The situation of Roma in Austria is notably relevant in three key regions: Vienna, the region of Burgenland, and Oberösterreich (Linz). In Burgenland, the majority of Roma are Austrian citizens, whereas in the other areas, they primarily house immigrant Roma communities largely from neighbouring countries. Austrian Roma are typically more integrated into the Austrian social system from birth, while migrant Roma face more challenging initial circumstances, particularly due to language barriers and unfamiliarity with the local landscape. The current strategy lacks differentiation between indigenous and immigrant Roma, despite the latter encountering additional barriers due to these factors.

At the time of the adoption of new national Roma strategic framework by Member States, Austria was still implementing its previous Roma strategy<sup>20</sup> and so it only submitted answers to an already designed questionnaire by the European Commission in September 2021. The ongoing Strategy does not mention environmental justice, the environment or specific measures targeted at Roma in the areas of housing or sanitary services relevant to environmental justice. On the contrary, the Strategy refers to inclusive education, employment, housing, and healthcare policies to increase equal opportunities and to support socially disadvantaged persons more broadly, as part of its objectives. However, it specifies that up to 2020, its focus will include: education, labour market, combating antigypsyism, empowerment of Roma women and girls, strengthening Roma civil society and Roma youth empowerment. Housing and other related services were not mentioned. Nonetheless, the strategy indicates that the lack of targeted Roma policies and measures is also explained by the lack of statistical data about the situation of Roma.

According to the Austrian Roma Civil Monitor<sup>21</sup>, housing and environment are included within the areas of education and labour market, which is not obvious from the reading of the strategy, probably in the unpublished Annex, that the strategy refers to. Therefore, civil society argued that housing should be addressed more specifically within the strategy. Additionally, concrete measures for supporting Roma in terms of housing problems should be implemented, along with awareness-raising workshops for counselling centres in this field.



# BELGIUM



LOCAL  
MUNICIPALITIES  
OR  
AUTHORITIES  
DO NOT  
ALLOCATE  
DESIGNATED  
AREAS FOR  
CARAVANS.

While Travellers in Belgium continue to reside in caravans due to cultural preferences, lifestyle choices, and a general lack of trust towards the majority population, these caravans are recognized as legitimate housing in the country. However, a persistent issue remains unresolved: local municipalities or authorities do not allocate designated areas for caravans., unlike in France. Although there are financial resources available for creating such residential spaces, Traveller communities often face limitations on their stay duration. This restriction arises from societal intolerance, as the general population is averse to having Travellers near their own residences.

Belgium is a federal state comprising three communities and three regions. Their competences are distributed between the different political levels. The Flemish Region, the Brussels-Capital Region and the Walloon Region are competent inter alia for the economy, employment, agriculture, water policy, housing, works public, energy, transport, the environment, territorial planning, nature protection, supervision of provinces and municipalities. Under the Roma national strategy, each competent authority develops concrete actions according to its competences. As most competences fall under the Communities and Regions, most actions are at this level. The federal government assumes a coordinating role in the development and monitoring of this National Strategy.

The current national strategy of Belgium<sup>22</sup> is an action plan submitted 1 June 2022<sup>23</sup>, in which its objectives with regard to Roma Integration are set and in which each authority – at the federal, regional and community levels, according to various competences.

The Belgian Strategy does not mention environment, but it includes the “improving of access to housing” under horizontal goal number 7. As such, in the Region of Flanders, the Department of Welfare and Housing indicates that the policy aims for an integral approach, while in Wallonia, actions focus on promoting access to essential services, provide support in administrative procedures to Roma for the regularization of their stay; participate in the search for discounted accommodation and organize mediation and negotiation with owners and agents’ real estate.

The strategy contains action to finalize the implementing orders for the ordinance modifying the Brussels housing code in order to recognize the housing of Travelers taking into account the new regulations urban planning. Through the Order of March 17, 2022, the Government of the Brussels-Capital Region amending the order of the Government of the Brussels-Capital Region of November 13, 2008 which determines the acts and works that are exempted from planning permission, the opinion of the delegated official, the commune, the royal commission on Monuments and Sites, the commission of consultation as well as specific advertising measures or the intervention of an architect. Taking into account this new regulation, the implementing orders of article 191 of the Housing Code will need to be finalized in order to create a regulatory framework and adapted administration.

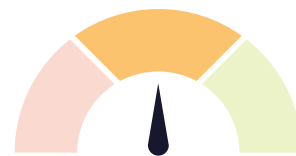
In the Region of Wallonia, the strategy proposes a new housing initiative called “Housing First” in order to provide an integrated support to tenants, including education and job search. The way the project will be implemented is through the Mediation Center which develops, depending on possibilities, a partnership for the rental, at moderate rents, of vacant homes. A first experiment with the Walloon Housing Society is currently being carried out successfully in Namur. Funding for these programs comes from the Walloon government decree of July 18, 2019 inserting provisions relating to assistance for Travelers into the Walloon Regulatory Code for Social Action and Health.

By contrast, the German-speaking Community is responsible for from January 1, 2020, for so-called public and private housing; the various bonuses and subsidies for housing and energy as well as the provision of advice which relate to it. Examples of accommodation that it provides, includes: emergency reception accommodation, offered in emergency situations, temporarily, and decided on a case-by-case basis according to the situation of the person, such as: (a) homelessness, family problems, addiction problems, domestic violence or financial problems; (b) accessible housing for low income people: there are “Social Real Estate Agencies” (TriLandum) in the North of the German-speaking Community and “Housing for All” (Wohnraum für Alle) in the South of the German-speaking Community, which rent apartments to disadvantaged individuals; (c) construction of public housing benefiting people with a total taxable income of less than: less than €45,100.00 for single; less than €54,100.00 for household made up of several people; the limit is increased by €2,700.00 per dependent child and cannot be owner or occupant of another apartment or house for two categories; (d) moving and rental assistance granted if, within the Community German-speaking, you move from unsuitable housing to suitable housing, for example: a recognized “overpopulation”, a recognized inadequacy (for example, a recognized disability of at least 66%), the accommodation does not meet the minimum unsanitary criteria, homelessness; (e) moving and rental assistance are also subject to income restrictions: no more than €14,500.00 for a single person; no more than €19,900.00 for several people. To this is added €2,700.00 per dependent child and €2,700.00 per adult or child with a disability. In addition, there is a moving allowance of €400.00, which is increased by €80.00 per child dependent. The moving allowance can also be granted if the person moves into social housing in this case the rent allowance will not be granted.

IN THE REGION OF WALLONIA,  
THE STRATEGY PROPOSES A **NEW**  
**HOUSING INITIATIVE** CALLED  
**“HOUSING FIRST”** IN ORDER  
TO PROVIDE AN **INTEGRATED**  
**SUPPORT** TO TENANTS, INCLUDING  
**EDUCATION AND JOB SEARCH.**



# BULGARIA



In Bulgaria, more than two-thirds of Roma live in ethnically segregated neighbourhoods, usually located on the outskirts of the districts or municipality. These neighbourhoods lack adequate infrastructure, or the existing ones are in a much worse condition than in other residential areas. In many places, there is a lack of construction regulations and settlement planning, which leads to the overrepresentation of informal housing and overcrowding, limited access to tap water and sewerage, electricity, and garbage collection, as well as lack of public transport.

Bulgaria submitted both<sup>24</sup> a strategy and action plan to the Commission in May 2022<sup>25</sup>. The Bulgarian Strategy lacks explicit reference to the environmental justice. However, the strategy does incorporate targeted measures and indicators under the operational objective: Improving housing conditions, including the adjacent technical and public service infrastructure. As such the strategy is set to achieve the following objectives: 1) Construction of an integrated geographic information system and introduction of orthorectified images taken with a drone; 2) Creation of a cadastral map and cadastral registers of territories, including areas with a compact Roma population; 3) Provision of municipal housing for accommodation of vulnerable groups of the population; 4) Construction / renovation of infrastructure for the provision of integrated health and social services in the community for vulnerable groups; 5) Reconstruction of social infrastructure sites for the purposes of education, culture, etc; 6) Search for tools to improve the legal and economic conditions for the elimination of non-compliant with the Spatial Planning Act (SPA) / legislation housing and neighbourhoods - adoption of an Act amending and supplementing the Spatial Planning Act to introduce the principle of proportionality in issuing an order for the removal of illegal construction, representing only housing for its occupants; 7) Expanding legal access to quality water, electricity and sewerage in isolated neighbourhoods with a concentration of poverty; 8) Support and implementation of innovative and effective solutions to overcome energy poverty among Roma communities in the country, and the inclusion of neighbourhoods with a predominant Roma population in energy renewal programs. The strategy indicates that the measures for achieving the goals are set out in the Action Plan for the implementation of the Strategy. However, the indicators accompanying the measures included in the strategy are quite vague and general, for examples: “Relative share of persons living in overcrowded housing” (Current value in%: 41.1% (2019) total for the country; 80.1% (2019) identified themselves as Roma); (Target value in%: Halve the overcrowding gap).

According to the Roma Civil Monitor report<sup>26</sup>, the Strategy predominantly concentrates on mapping segregation and spatial distribution, neglecting significant aspects related to enhancing living conditions and technical infrastructure. While the strategy outlines general goals such as municipal housing, health and social infrastructure construction, improved access to essential utilities, and measures to address illegal neighbourhoods, it lacks specificity in its objectives. The only clear objective pertains to amending legislation to incorporate the principle of proportionality in forced evictions. Moreover, the strategy lacks specific

**MORE THAN 2/3 OF ROMA LIVE IN ETHNICALLY SEGREGATED NEIGHBOURHOODS, USUALLY LOCATED ON THE OUTSKIRTS OF THE DISTRICTS OR MUNICIPALITY.**

**THE STRATEGY PREDOMINANTLY CONCENTRATES ON MAPPING SEGREGATION AND SPATIAL DISTRIBUTION.**

actionable measures aligned with its stated objectives, apart from the completion of social housing under the Regional Development Operational Programme 2014-2020. However, evidence suggests that only a minimal provision has been made for Roma families in this program.

## CROATIA

**THE STRATEGY  
DISTINCTLY  
FOCUSES ON  
SPATIAL  
PLANNING,  
HOUSING, AND  
ENVIRONMENTAL  
PRESERVATION.**

Most Roma families live in houses that are in good or relatively good condition (63%), but 28% of Roma families live in houses that do not meet basic safety requirements, i.e., that are in poor or dilapidated condition. Barracks, sheds, shacks, and houses that do not meet the basic security requirements make up 33% of all housing units in which the Roma live. The largest share of houses in poor or dilapidated condition is located in Slavonia (40%), while the largest number of barracks, sheds and shacks is in Istria and Primorje (12%).<sup>27</sup> As a result, Croatia, 31% of Roma are exposed to pollution, dirt or other environmental problems in their communities, slightly higher than the EU average (25%). As many as 92% of the Roma population residing in settlements outside urban areas confront environmental challenges such as polluted air, while 79% contend with polluted water. Furthermore, 72% of those living in these dislocated settlements encounter issues with garbage accumulation in streets or near their residences. Common sources of air pollution in Roma localities stem from nearby industrial plants, chemical-treated farms and agricultural lands, unregulated drainage channels, both legal and illegal landfills.<sup>28</sup>

Croatia submitted its strategy<sup>29</sup> to the Commission in October 2021. The Strategy distinctly focuses on spatial planning, housing, and environmental preservation. It encompasses a dedicated measure aimed at “reducing environmental and infrastructural inequalities in Roma communities (localities) compared to the communities in which the majority population lives”, under the specific objective of “effective and equal access of the Roma to suitable desegregated housing and basic services”.

In addition, under the same housing objective, the strategy includes specific measures but undefined outcome indicators (e.g. % of Roma population connected to the public water supply system), such as: Reducing the gap in housing deprivation between the Roma and the general population; Reducing the gap in overcrowded living conditions between the Roma and the general population; Reducing environmental and infrastructural inequalities in Roma communities (localities) compared to the communities in which the majority population lives; Providing access to water intended for human consumption in the household. As part of the proposed measures, a number of activities are envisaged, including: provisions for tap water, safe drinking water, appropriate sanitation, waste collection, environmental protection services, electricity, gas, transportation, and physical infrastructure. The aim is to ensure uninterrupted access to essential utilities under regular circumstances as well as during pandemics, environmental crises, and other emergencies.

**EFFORTS ARE  
OUTLINED TO  
ERADICATE  
AND  
FORESTALL  
SPATIAL  
SEGREGATION.**

Similar efforts are outlined to eradicate and forestall spatial segregation while advocating for desegregation through the formulation of specific plans to tackle housing challenges. This involves active participation from local and affected Roma communities and integrated housing initiatives tailored for marginalized Roma. These efforts combine microloans for constructing and maintaining housing units with financial literacy and savings programs, alongside training programs in construction and incentivizing measures.

Despite this, the Roma Civil Monitor<sup>30</sup> argues that political will is missing and that segregation has not been addressed by the ruling party because it is conducive to politicians exacting votes from Roma communities in exchange for the provisioning of different goods and services.

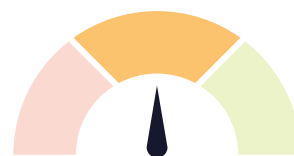
## CYPRUS

In Cyprus, Roma live either in properties belonging originally to Turkish Cypriots who were forcibly moved to the northern areas of Cyprus and now administered by the Cypriot Government or in prefabricated houses or container-like units in specially designated areas in remote Roma segregated settlements of in dismal poverty. In 2003, the authorities then relocated the Roma in two settlements of prefabricated houses, 34 where they live in extremely poor conditions.

As referenced in the Roma Civil Monitoring report<sup>31</sup>, the Council of Europe's European Commission against Intolerance (ECRI) indicates that this relocation amounted to segregation and called upon the authorities to close the settlements and relocate Cypriot Roma to areas where they can mix and integrate with the rest of society. Forced evictions are frequently carried out by governments without any regard to human rights safeguards. The Roma Civil Monitor review assesses that Strategy only includes the possibility of social housing for all those who need it, including Cypriot Roma, but does address any issues such as segregation, forced evictions and poor living conditions of Roma.

The Cyprus Strategy<sup>32</sup> was submitted in December 2021. The cursory strategy of only 16 pages does not include comprehensive information to understand all the measures and activities envisaged therein. As such it does not mention environment or environmental justice; however, it includes a reference to Cyprus's Recovery and Resilience Plan, with the aim to make Cyprus "a country that is among the pioneers in Green and Digital transition."<sup>33</sup>

In the area of housing, the strategy only references measures for improving the housing conditions of the Roma, activating all the necessary processes available in order to accommodate individual's needs and services depending on their specific circumstances, without however including or describing any of the measures envisaged. In addition, under the Section 3.4 'Social Support', the strategy refers to the Guaranteed Minimum Income (GMI), which provides benefits such as housing, care and emergency needs, and disability. The GMI can be provided to people in need, including Cypriot Citizenship Roma people.



**STRATEGY ONLY  
INCLUDES THE  
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DOES ADDRESS  
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SUCH AS  
SEGREGATION,  
FORCED  
EVICTIONS AND  
POOR LIVING  
CONDITIONS  
OF ROMA.**



# CZECHIA



The estimated population of Roma in the Czech Republic is 262,000 or 2.4% of the population.<sup>34</sup> Approximately half of them live integrated into the mainstream population, while the other half are concentrated in neighbourhoods facing different degrees of marginalisation and exclusion. According to the Fundamental Rights Agency (FRA), up to 21% of Roma lived in dwellings with leaky roofs, damp walls, floors or foundations in 2016 or rotting window frames or floors, where 9.2% of the general population experienced these difficulties and where overcrowding is also a housing problem.<sup>35</sup>

The Czech Strategy was submitted together with an implementation plan in October 2021. The strategy does not mention environmental justice or the environment more broadly. Instead, the strategy includes references and links to other EU Framework objectives and relevant sectoral strategic frameworks and documents<sup>36</sup>.

THE STRATEGY  
ACKNOWLEDGES  
THAT ROMA  
ARE ONE OF  
THE MOST  
THREATENED  
GROUPS ON  
THE HOUSING  
MARKET.

The strategy acknowledges that Roma are one of the most threatened groups on the housing market, not only because of their high representation among low-income households, but mainly because of discrimination and antigypsyism. The Czech strategy recognises the existence of spatially segregated localities and the low quality of housing of Roma and the absence of a law on social housing. Under the objective of ensuring equal access of Roma to quality housing, the strategy includes three distinct characters discussing the EU and national policy an legislative frameworks and standards and describes the overall exclusion from housing and spatial segregation and their discrimination in the housing market without including therein specific measures or expected outcomes, which were probably included in the submitted action plan, which the Commission did not publish on its website alongside the strategy.<sup>37</sup>

## Good practice

The Strategy includes as a positive example of good practice and an inspiration for solving the problem of Roma housing shortage, the Housing First project, as a successful measure to prevent homelessness. As part of the pilot testing of rapid housing for families with children, “Rapid Re housing”, the Municipality of Brno and several Brno districts provided housing in non-segregated municipal apartments to fifty families in long-term housing need, two-thirds of which were Roma families. The results of the projects showed that there was an improvement in school attendance and school results of the children, an increase in the subjective feeling safety and well-being and to a higher ratio of family reunification, which were previously forced to live separately due to the housing shortage. Brno’s “Rapid Re-housing” program won the prestigious award for the best European project to end homelessness in 2017, awarded by the European Commission and the European Federation of National Organizations Working with Homeless People. In 2020, in cooperation with the Ministry of Internal Affairs and Communications, its pilot verified local social housing systems or implemented the housing first approach in 20 municipalities across the Czech Republic.<sup>38</sup>

# DENMARK



The Roma population in Denmark can broadly be distinguished into two categories: domestic Roma and mobile EU citizens of Roma origin living in Denmark. There are no official statistics on the national Roma population in Denmark since ethnic data is not registered by Danish authorities and institutions. Estimations of the population size range between 1,500-10,000 national Roma in Denmark. The domestic Roma population comprises migrant workers who arrived from the former Yugoslav republics in Denmark in the 1970s and their families, and former refugees from the Balkan war who came in the 1990s and their families. Regarding mobile EU citizens of Roma origin, there are no official statistics on the numbers who reside in Denmark, though many live in poverty or are homeless.

The Danish strategy was submitted in November 2021.<sup>39</sup> The strategy states that the Danish State is obliged to ensure access to all citizens and persons with legal residence status to adequate housing by way of allocating social housing to disadvantaged persons and families. The country's strategy particularly highlights legislation concerning social support for housing for disadvantaged families and persons who become homeless and who do not themselves have the possibility to solve their housing problem. It highlights that the state is obliged to support these families and persons to find a place to live, and through financial payments.

The Strategy acknowledges the government's efforts to prevent evictions due to rent arrears, which have notably reduced eviction rates. It also references Denmark's initiatives to combat homelessness through a national strategy yet lacks specific examples. Instead, it mentions regulations restricting year-round residency on camping grounds, allowing only short-term stays. Regrettably, the strategy falls short in addressing antigypsyism concerning housing and governmental actions to combat homelessness, as it doesn't outline specific measures in these contexts.

**REGRETTABLY, THE STRATEGY  
FALLS SHORT IN ADDRESSING  
ANTIGYPSYISM CONCERNING  
HOUSING AND GOVERNMENTAL  
ACTIONS TO COMBAT  
HOMELESSNESS.**

# ESTONIA



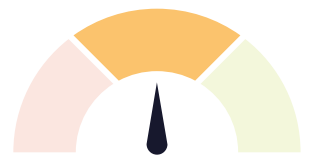
According to the National Population Register, there are 649 people living in Estonia who self-identify as Roma. Unofficial data and international organisations suggest that the numbers are higher in reality and there are approximately 1,000-1,500 people of Roma origin in Estonia.<sup>40</sup>

There are no Roma settlements in Estonia. The Roma in Estonia live in regular housing, sometimes in social housing, due to difficulties in finding suitable and affordable rental apartments. Homelessness has not been reported as a problem, but there have been reports of poor living conditions from representatives of the Roma communities. No large-scale research has been conducted on this topic that could provide a more generalised picture of the situation.

**THERE IS  
NO ROMA  
SPECIFIC  
STRATEGY  
IN ESTONIA.**

There is no Roma specific strategy in Estonia. The Estonian government submitted instead the Cohesive Estonia Strategy 2030 and Cohesive Estonia - Integration, incl. Adaptation Programme 2022-2025 as a set of integrated measures in April 2022. Under the Cohesive Estonia Strategy, Roma are mentioned four times as an afterthought with no serious measures for achieving meaningful outcomes and with no specific mentioning of environment of measures on Roma housing or health care. The Strategy only includes two measures and related indicators in employment and education of Roma.

# FINLAND



According to the Roma Civil Monitoring report, there are approximately 10,000 Roma who live in Finland. There are no separate Romani communities or settlements, they live all-around Finland, and about 3,000 Roma in the metropolitan area of Helsinki.<sup>41</sup>

Finland was implementing an ongoing National Roma Policy 2018-2022 at the time of submission of the expected national Roma strategy; as a result, Finland submitted answers to a questionnaire in January 2022. However, in the meantime a new Strategy 2023-2030 was adopted in March 2023<sup>42</sup>. The new Strategy does not mention environmental justice or environment as such.

According to Finland's new Roma Strategy<sup>43</sup>, the standard of housing among the majority of Roma corresponds to the average Finnish standard. However, existing housing challenges occur in the rental housing market<sup>44</sup>, where Roma face prejudice against them<sup>45</sup>. According to the Roma Civil Monitor<sup>46</sup>, many Roma also live in state-subsidised rental homes and apply for housing allowances from the

**EXISTING  
HOUSING  
CHALLENGES  
OCCUR IN  
THE RENTAL  
HOUSING  
MARKET,  
WHERE  
ROMA FACE  
PREJUDICE.**



Social Insurance Institution (KELA), which does not always have the knowledge and training to deal with less educated Roma or the elderly who lack digital skills.

Recently, the Parliament enacted an act on support to municipalities for housing advisory services for 2023-2027 with a view to safeguard funding for municipal housing advisory services so that the municipalities will be able to provide the service. Hence, the strategy includes actions regarding housing advisory services that should be utilised with Roma together with mediation services in order to improve accessibility to housing for Roma. This is also a reflection and a recommendation from Roma civil society.<sup>47</sup>

In order to implement these measures, the government is proposing the setting up a working group with representatives from municipalities and large property companies and planning and implementing development measures, mediation activity and training, as well as making use of the Non-Discrimination Ombudsman's recommendations on equal housing.

## FRANCE



The exact numbers of Roma and Travellers in France are unknown with estimates from 400,000 to 1.2 million and at least 12,000 Roma, who have immigrated from Romania and Bulgaria, live in unofficial urban camps throughout the country.<sup>48</sup> France has more than 300 slums where around 15,000 people from European Union countries (Romania and Bulgaria) live. These slums, or camps, illegally established on land or in squats, present health risks and the safety of residents, and often disturbances to public order.<sup>49</sup>

The French government submitted its new strategy in January 2022<sup>50</sup>. The strategy targets Travellers, whose permanent residence is a caravan, as well as individuals from Central and Eastern Europe residing in camps and slums, primarily comprising Roma from Romania and Bulgaria.

With regards to Travellers, the French Strategy includes a specific measure on Improving the environment and location of stopping areas under the second strategic objective of Improving living and inclusion conditions for Travellers, alongside other measures to Relaunching implementation of departmental plans for receiving and accommodating Travellers and Supporting development of rented family plots and respective monitoring indicators. The Strategy includes a third strategic objective focusing on speeding up slum clearance where intra-European nationals in vulnerable situations are living.

The French strategy includes measures and indicators, such as the 'establishment of a public policy for the complete elimination of slums', 'safeguarding the living conditions of people living in slums (waste collection, electricity, site organisation', 'encouraging social inclusion and access to empowerment for people living in slums', 'consideration of the specific needs of people living in camps and slums and developing involvement and civic participation of slum residents and former slum residents'.

In the Strategy, the French government particularly undertakes to improving how Travellers are received and the type of accommodation on offer, in quantity and in quality, and diversifying this to better consider the needs of people. Regarding Roma migrants originating from Central and Eastern Europe, the Strategy indicates that France is assuming its share of responsibility through its slum clearance policy where Roma and Travellers live, leading a human policy of social inclusion and access to rights for these European citizens.

## **Good practice**

With the instruction of January 25, 2018, the Government wishes to sustainably reduce the number of slums and provide their residents with pragmatic solutions promoting their integration into the respect for the laws of the Republic. An annual national envelope of credits is dedicated specifically to supporting field actions. Led by the Interministerial delegation for accommodation and access to housing these credits are delegated to the prefectures concerned. In 2019, the government decided to double these credits for 2020. The national envelope increased from €4 to €8 million in order to change the scale of the support provided to the territories. Since 2017, actions co-financed using credits from this dedicated national envelope have enabled more than 3,000 people to access housing and more than 2,000 to obtain employment. The government also developed a digital information and management tool, the Résorption-slums platform, for those involved in slum clearance. Developed within the framework of a state start-up, it aims to increase the power to act of the actors involved thanks to detailed knowledge, in real time, of the field and its evolution, to a simplification of the monitoring of their actions, and better coordination between them.

THE STRATEGY INDICATES THAT FRANCE IS ASSUMING ITS **SHARE OF RESPONSIBILITY** THROUGH ITS **SLUM CLEARANCE POLICY** WHERE ROMA AND TRAVELLERS LIVE, LEADING A **HUMAN POLICY OF SOCIAL INCLUSION AND ACCESS TO RIGHTS** FOR THESE EUROPEAN CITIZENS.

# GERMANY

It is estimated that there are around 170,000-300,000 Sinti and Roma in Germany, constituting around 0.2-0.4% of the population, although no ethnic data collection is allowed in Germany.<sup>51</sup>

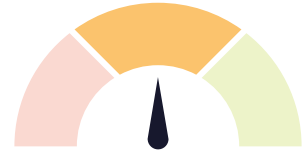
Germany submitted its Strategy in March 2022.<sup>52</sup> The German Strategy does not mention environmental justice as such, but it links social housing construction with the Climate Action Emergency Programme and the Energy and Climate Fund.

As such, the German strategy proposes measures regarding equal access to education, employment, health and housing and particularly regarding access to adequate, non-segregated housing and basic services and Integrated programmes for urban development for integration and participation – targeted to migrants and people with a migration background and not to Roma specifically.

While overall housing is implemented at the level of Germany's federal system, responsibility for social housing promotion was transferred from the Federation to the Länder since 2006. Even though the German strategy indicates that the German Federal Government conducted an indicator-based integration monitoring at federal and Länder level<sup>53</sup>, no list of indicators is included in the German strategy itself.

Under its general Housing Strategy, referenced in the Roma strategy<sup>54</sup>, the Federation made 5 billion euro available to the Länder for social housing promotion for the construction of 100,000 new social rental apartments. In addition to the 1 billion euro in programme funding allocated to social housing construction, the Federation indicated a further 1 billion euro available in 2022, earmarked for climate-friendly social housing construction under the Climate Action Emergency Programme and the Energy and Climate Fund. The Strategy indicates that the Federation will continue to financially support social housing construction going forward, and to increase funding. Roma migrants can be issued with a certificate of eligibility for public housing (Wohnberechtigungsschein) under the same conditions as others if they are entitled to stay in Germany.

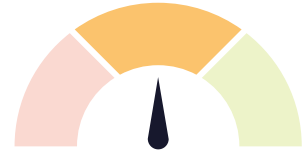
There are also numerous measures at Länder and local level. The City of Dortmund has adopted a Roma-specific approach when it comes to housing: its Access to Housing strategy is based on the idea of creating sufficient appropriate housing for the project's target groups, i.e. large migrant families with several children and a Roma background from EU Member States.<sup>55</sup>



**STRATEGY IS  
BASED ON  
THE IDEA OF  
CREATING  
SUFFICIENT  
APPROPRIATE  
HOUSING FOR  
THE PROJECT'S  
TARGET  
GROUPS.**



# GREECE



The Council of Europe estimates that there are 265,000 Roma in Greece, representing approximately 2.5% of the overall population.<sup>56</sup> The population of Roma in Greece is scattered and consists of heterogeneous, mostly contrasting groups with different levels of integration. Only a part of Roma are formally recognised as a minority – based on the religious ground, Greece recognises only the Muslim Roma in Western Thrace.<sup>57</sup>

Greece submitted its strategy to the Commission together with an action plan in February 2022<sup>58</sup>. The Greek Strategy includes synergies with other governmental strategies and policies, such as the Action Plan for Combating the Energy Gap, prepared by the Ministry of Environment and Energy, which is considered the first beneficial step for the adoption of a coherent strategy with for the holistic response to the phenomenon of the energy crisis in Greece in the period 2021-2030 through the design and implementation of targeted policy measures towards combating energy problems benefiting vulnerable categories of people.

The Greek strategy also includes measures to strengthen the equal access of Roma to basic services and needs, including social security services, employment and vocational training, social housing, childcare, long-term care and social welfare.

## STRATEGY FOCUSES, ON THE IMPROVEMENT OF LIVING CONDITIONS.

In relation to housing, the Strategy focuses, inter alia, on the improvement of living conditions (adequate and quality separate toilets, access to running water and basic infrastructure, elimination of living in multi-family households). The Action plan includes specific measures for temporary Relocation of special social groups and resettlement interventions to improve living conditions according to local needs; housing rehabilitation (rent subsidy - better living conditions - creation of infrastructure and replacement of buildings with housing; actions for access to affordable housing for the homeless, families with severe material problems living in a sheltered residence - infrastructure, energy upgrades, etc. as well as measures for holistic planning for the development of the social housing sector - housing rehabilitation as a tool for social actions.

In terms of indicators in the area of housing, the Greek strategy includes six different indicators, inter alia: no. of people who live in an apartment that is pitch dark and has water leaks in the walls and/or floors, no bathtub/shower, no indoor toilet (28% from 37% in 2016); no. of people living in households without running drinking water (3% from 9% in 2016) and no. of people living in households that do not have toilets, showers, or bathrooms inside the house (25% of households of 30% in 2016).

## Good practice

As a promising practice, Greece has developed subsidies to tackle energy poverty and provide an 'energy card' to affected households, but a comprehensive package of integrated services to tackle the phenomenon is still to be developed.<sup>59</sup>

# HUNGARY



**THE HUNGARIAN STRATEGY AIMS TO ERADICATE SETTLEMENTS THAT ARE OFTEN HARDLY SUITABLE FOR HUMAN HABITATION.**

Roma communities are concentrated in north-eastern Hungary and southern Transdanubia, with high proportions living in small settlements often located in disadvantaged, peripheral regions. They predominantly reside in Roma-exclusive settlements or isolated ghettos within urban and rural areas. The locations of their habitation are commonly lacking in basic infrastructure such as asphalt roads, sidewalks, and even access to running water. In numerous instances, asphalt roads, sewer systems, and water pipes terminate at the periphery of the Roma settlements. The absence of organized waste disposal exacerbates the situation, and the poor state of roads poses a critical challenge, hindering ambulance access during medical emergencies, particularly in winter or inclement weather conditions that result in muddy and wet roads. Moreover, the primary source of drinking water for these communities is often limited to a public well.

Hungary submitted its strategy and action plan in September 2021.<sup>60</sup> The Hungarian Strategy outlines a targeted goal focusing on “Territorial Inequalities,” encompassing interconnected facets such as settlement development, housing and energy poverty, and environmental awareness and protection. This comprehensive approach seeks to address and integrate diverse elements within the broader context of territorial planning.

As explained in the strategy, a horizontal goal that crosses all functional areas is the reduction of ethnic and territorial inequalities and social separation. The territorial inequalities’ targeting focuses primarily, but not exclusively on the highly affected areas (Northern Great Plain, Northern Hungary, Southern Transdanubia), but at the same time it takes into account that other areas also have disadvantaged areas, segregated areas and areas at risk of segregation.

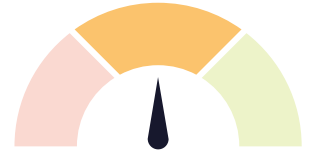
Under the aspect of environmental protection, the Hungarian strategy includes aspects of sustainable development in catch-up programs, sustainable development of the energy efficiency of apartments, cleaning of the physical and natural surroundings of the segregated areas for the purpose of environmental and landscape protection, as well as helping disadvantaged people to find employment in the green economy.

In addition, under “Territorial segregation and housing aspects”, the Hungarian Strategy aims to eradicate settlements that are often hardly suitable for human habitation, and in some cases - taking into account the unique circumstances - the rehabilitation of the settlements, their integration into the fabric of the settlement.

## **Good practice**

Intervention Concept for the Management of Settlement-like Housing – is a complex housing model program for FETE settlements (“Efzárkózó settlements”) and segregated settlements offering a long-term solution. The selection of settlements is based on local statistical indicators, and their gradual involvement depends on the receptiveness of the local community (including the municipality) and the greatest possible (regional) impact is taken into account. FETE is realized on the basis of the ‘Presence’ program, which was also awarded the Hungarian Heritage Award in 2016.

# IRELAND



Travellers refer to the approx. 35,000 Irish Travellers living in Ireland, who were officially recognised as a minority ethnic group in 2017. Roma refers to those who identify as Roma in Ireland, approx. 4,000-5,000 people. This includes migrants and second and third-generation Roma, many of whom are Irish citizens.<sup>61</sup>

Ireland has not adopted yet its new Strategy and submitted in May 2022 answer to the Commission questionnaire.<sup>62</sup> In its previous strategy from 2017-2021<sup>63</sup>, aspects of environmental justice are not mentioned, but the strategy includes measures in the areas of Education, Accommodation, Healthcare and Employment for the Traveller Community. The strategy also mentions initiatives in place in the same areas to assist the Roma community who are EEA citizens.

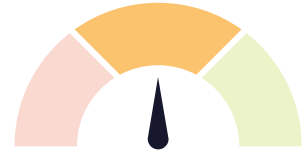
The housing and accommodation activities are primarily focused on improving the implementation of Traveller-specific accommodation programmes through local authorities, and no activities address the accommodation needs of Roma.

According to the strategy, Travellers are free to express a preference for any form of accommodation, including halting site accommodation, through the statutory Assessment of Housing Needs carried out by local authorities. Local Authority Traveller Accommodation Programmes are informed by this Assessment of Housing Need and show that the vast majority of Travellers have opted for standard housing or group housing. It should also be noted that most Travellers already live in standard housing, either in standard local authority housing, private rented housing, in houses provided from their own resources or in private houses with the assistance of their local authority<sup>64</sup>.

**THE HOUSING AND ACCOMMODATION ACTIVITIES ARE PRIMARILY FOCUSED ON IMPROVING THE IMPLEMENTATION OF TRAVELLER-SPECIFIC ACCOMMODATION PROGRAMMES THROUGH LOCAL AUTHORITIES.**



# ITALY



In Italy, around 13,000 Roma and Sinti live in mono-ethnic settlements, marked by poor security, severe sanitary conditions, and lack of security of tenure.<sup>65</sup> According to some surveys (Kethane-Rete Operatori Nazionali Usato, 2021) about 40% of the Italian Roma and Sinti population formally or informally carries out activities related to the circular economy (iron collection and waste recycling, qualification and sale of used objects), which are a fundamental source of income for families and are considered to be socially useful work.

Italy submitted its strategy in May 2022.<sup>66</sup> The Italian Strategy includes measures and indicators on the access to adequate accommodation and the right to housing of Roma, with the focus on increasing effective equality of access to adequate and non-segregating housing and essential services, prevention of the risks of marginalisation and segregation of residents, as well as obstacles to the right to education, access to social and health services and employment. The strategy also promotes processes of transition to conventional forms of housing and supports initiatives, also of an experimental nature, of self-building and self-recovery, as part of paths towards socio-economic and housing autonomy.

Housing transition projects primarily aim to support diverse interventions related to housing for the Roma and Sinti populations in camps and are accompanied by a set of guidelines prepared by the Italian equality body. Considerations include household income and saving capacity, crucial for ensuring the sustainability of transition costs. In nearly two-thirds of the projects, a major operational challenge is the beneficiaries' difficulty in meeting housing costs such as rent and bills. To address this, 40 projects include measures for legal status regularization, including the renewal of expired documents or resolving irregular administrative positions. Notably, all projects focusing on legal status regularization also include actions to support housing autonomy. However, addressing Antigypsyism remains crucial in the efforts towards housing inclusion and the departure from marginalized settlements.

The strategy includes particular mention of activities falling under circular economy, within special Recovery, Refurbishment and Recycling Centres where the following is recommended: the collection, also on the basis of special agreements with municipalities and town councils, of materials and objects to be saved from disposal in landfills, as they can be reused even if in different forms (recovery); their sanitisation; their adequate treatment either to extend the life of the products by restoring their functionality or to recover raw/secondary materials and/or the energy and know-how incorporated in them (refurbishment); the sale of the resulting products. As well as creating jobs, the other important effects of these centres would be a reduction in rubbish, with consequent benefits for the environment, and the elimination of senseless waste.

While civil society in Italy recognizes that the innovative and complex approach proposed by the strategy, they are concerned about its expected impact.<sup>67</sup> In addition, civil society indicated the failure of the Strategy to consider the housing conditions of Roma of Italian nationality of ancient settlements and of the families present in informal settlements; the scarce attention paid to the issue of the involvement of the Roma and Sinti communities in the decision-making processes about leaving the settlements.

**THE STRATEGY INCLUDES PARTICULAR MENTION OF ACTIVITIES FALLING UNDER CIRCULAR ECONOMY, WITHIN SPECIAL RECOVERY, REFURBISHMENT AND RECYCLING CENTRES.**

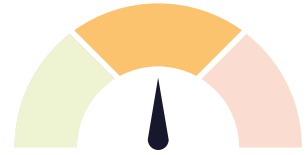
# LATVIA

**SPECIFIC MEASURE ON INCREASING ENERGY EFFICIENCY IN RESIDENTIAL BUILDINGS AND EFFICIENT USE OF RESOURCES UNDER ACCESS TO HOUSING.**

According to the Latvian Central Statistical Bureau, in 2018, there were 5,082 Roma living in Latvia, which represents about 0.3 percent of the total population. However, according to unofficial estimates, the Roma community has up to 15,000 people. Despite a lack of fully reliable and comparable data, a gradual decrease in the number of Roma has been observed in recent years, one of the reasons being that Roma have emigrated to foreign countries in search of employment.<sup>68</sup> A 2019 European Social Fund funded research quoted in the strategy<sup>69</sup> reported that housing availability is problematic for poor Roma (expert estimates 75 to 80% Roma), low level of improvement of housing inhabited by Roma (42.1% of housing does not have a toilet with water outlet, 26% of housing does not have access to water supply) and a large part of Roma housing is overpopulated.

Latvia submitted its strategy in May 2022.<sup>70</sup> The Latvian Strategy does not target environment services directly, but the strategy does include elements of environmental justice. Within the strategy, there is a specific measure on increasing energy efficiency in residential buildings and efficient use of resources under access to housing.

The Latvian strategy proposes mainstream measures and indicators regarding access to housing for disadvantaged residents in difficulty (versus measures targeted directly at Roma) for improving their access to housing, as well as measures to support private individuals (families with children) for the purchase or construction of housing. Consequently, the Latvian strategy assumes that Roma could benefit from the supporting measures provided to socially disadvantaged people in the framework of the National Industrial Policy Guidelines.



# LITHUANIA

According to the population and housing census of 2011, the country was inhabited by 2,115 Roma people.<sup>71</sup> Since 1989, the number of Roma in the country has been gradually decreasing. Most Roma, 81 percent, live in urban areas. The largest communities are in the country's capital Vilnius (38 percent of the total Roma population, or 814 persons).<sup>72</sup> Most Roma (93 percent) have Lithuanian citizenship, but there are also Roma with Russian citizenship (2.3 percent), and the rest (2.6 percent) have other or no citizenship.<sup>73</sup>

Lithuania submitted its strategy and action plan in June 2022.<sup>74</sup> The Lithuanian Strategy is a brief document of five pages, including general provisions on education and employment, but not on health and housing. No specific measures or indicators that would address environmental justice are included, despite the



**A BRIEF DOCUMENT OF FIVE PAGES, INCLUDING GENERAL PROVISIONS ON EDUCATION AND EMPLOYMENT.**

fact that housing was identified as the key problem in the 2017-2020 Roma Civil Monitor report<sup>75</sup> and the Second European Union Minorities and Discrimination Survey (EU-MIDIS II)<sup>76</sup>. The Discrimination Survey shows that 80% of Roma interviewed are at risk of poverty compared with the EU average of 17%, while 30% live in households with no tap water, and 46% have no indoor toilet, shower or bathroom.<sup>77</sup>

According to the Roma Civil Monitor, in 2020, the largest Roma settlement in the Baltic states – the Kirtimai Roma village called ‘tabor’ – was demolished because it had been built illegally.<sup>78</sup> However, the procedure for providing re-housing to those living in the settlement was not set in place before the demolition, so the Roma families had to find new homes on their own. Although the Vilnius Municipality offered compensation for the renting of flats or houses, due to discrimination Roma could rent housing and benefit from the municipality’s support.

## LUXEMBOURG



There are no official figures for people of Roma origin in Luxembourg, but in 2012, the Council of Europe estimated their number about 300. Most of them came to the country as asylum seekers from the Balkans or Eastern Europe. There are no ethnically disaggregated data available and no self-declared Roma or Roma/pro-Roma civic organisations.<sup>79</sup>

Because of the lack of data about Roma population in Luxembourg, the government opted for an integrated set of policy measures within broader social inclusion policies for implementing its equivalent of a ‘National Roma Strategy.’ As a result, Luxembourg submitted answers to the Commission questionnaire, instead of a strategy, in December 2021.<sup>80</sup> The general measures on integration include the areas of employment, health, housing and education. The Luxembourg approach consists of integrating anyone who wants to settle legally on its territory.

Concerning elements aimed at addressing environmental injustices, the Strategy refers the Law of January 19, 2004, concerning the protection of nature and natural resources<sup>81</sup>, which defines that caravan parking is authorized on campsites and inside areas not classified as “green zones” on funds joining constructions, without prejudice to more restrictive provisions to be enacted by the municipal council.

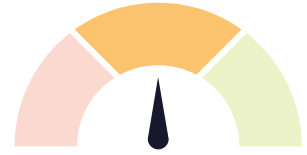
Additionally, the law of July 11, 195<sup>82</sup>, governing camping activities, stipulates that camping on private land, apart from designated campsites, necessitates the consent of the landowner. This underscores the importance of obtaining permission for camping on private property in compliance with the legal framework.

Considering lack of consistent available evidence of Roma communities in Luxembourg, the recommendation of the Roma Civil Monitor<sup>83</sup> was that Luxembourg is exempted from the ‘EU Strategic Framework for Roma equality, inclusion and participation’ on similar grounds to Malta, which is not part of a monitoring process.

**CARAVAN  
PARKING IS  
AUTHORIZED  
ON CAMPSITES  
AND INSIDE  
AREAS NOT  
CLASSIFIED AS  
“GREEN ZONES”.**



# NETHERLANDS



In the Netherlands, there are between 20,000 and 40,000 (approximative 0.24% of the Dutch population) Roma, Sinti and Travellers (woonwagenbewoners-caravan dwellers), living all over the country, in mobile or permanent houses, who have arrived in the Netherlands in successive waves, from various countries (in the case of Roma, mainly from Eastern Europe).<sup>84</sup>

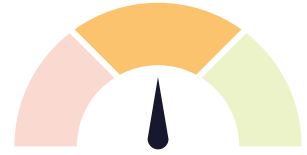
Roma individuals in the Netherlands predominantly reside in conventional housing.<sup>85</sup> Among the Sinti community, some inhabit permanent homes, while a significant proportion opt for mobile residences or caravan sites. Although the majority of Woonwagenbewoners live in mobile homes on caravan sites, a considerable number find themselves in permanent housing due to unavoidable circumstances. This may occur when their caravan site closes, or in situations where the caravan owner passes away, leaving family members excluded from the lease agreement and unable to continue residing in the caravan. Unfortunately, specific data detailing the distribution of Sinti, Roma, and Woonwagenbewoners within caravan sites is currently unavailable.<sup>86</sup>

Netherlands submitted a set of measures for the equality, inclusion, and participation of Roma and Sinti in September 2021.<sup>87</sup> The Dutch measures do not explicitly address environmental considerations within its Strategy. In addition, housing measures are not specifically tailored for the Roma and Sinti communities.

The Strategy asserts that Roma and Sinti individuals have equal opportunities to secure suitable rental homes, much like any other residents. Additionally, it acknowledges that a significant majority of Roma and Sinti in the Netherlands live in mobile homes. Notably, the Strategy lacks specific indicators to measure progress or outcomes.

**HOUSING MEASURES ARE NOT SPECIFICALLY TAILORED FOR THE ROMA AND SINTI COMMUNITIES.**

# POLAND



**CONDITIONING TO AID FAMILIES RESIDING IN THE «POOREST HOUSING CONDITIONS» UPON THEIR WILLINGNESS TO INTEGRATE AND FULFIL CIVIC OBLIGATIONS, IS CONTRADICTORY TO THE FUNDAMENTAL GOAL OF PROVIDING HOUSING ASSISTANCE TO THOSE IN NEED.**

Since the end of World War II, Poland is a homogeneous country in which all national and ethnic minorities constitute a little over 1% of 38.5 million inhabitants. According to the latest 2011 Population and Housing Census, 17,049 Polish citizens declared to belong to the Roma ethnic minority. Nonetheless, according to local institutions, Roma organisations and researchers, the number of Roma in Poland is estimated to be between 25-35 thousand.<sup>88</sup>

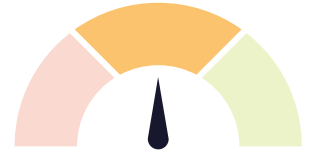
The Roma in Poland belong predominantly to five groups. Polska Roma (Polish Roma), Romowie Karpaccy (Carpathian Roma, also known as Bergitka Roma), Kełderasze, Lowarzy and Sinti. These groups differ in culture, and in social and economic situations. According to Polish Law, Roma are legally recognised since 2005 as an ethnic minority.<sup>89</sup> Roma in Poland are also urban settlers. Moreover, their relatively small numbers and a somewhat even dispersion throughout the country are not causing the problem of 'ghettoisation', or high concentration in small areas. In isolated cases, however, such concentration occurs with all its negative consequences.<sup>90</sup>

Poland submitted an integrated set of measures<sup>91</sup> on Roma inclusion to the Commission in September 2021.<sup>92</sup> The Polish Strategy recognizes the particularly challenging situation faced by communities residing in the southern and western regions, notably in mountainous areas. This is primarily attributed to the persistent housing deficit across Poland, a notable scarcity of communal and social housing, insufficient stable income within Roma households to facilitate flat purchases or qualify for loans, and the multi-generational nature coupled with the sizable size of Roma families.

Yet, the Polish strategy does not specifically address environmental justice components. Moreover, the housing objective, aimed at enhancing living conditions for the Roma in the most impoverished circumstances, lacks explicit and measurable measures. The strategy however indicates that it focuses on improving housing conditions in those cities where the housing problem threatens the life or health of residents. And that support should be provided primarily to families living in the poorest housing conditions, characterised by readiness for integration and fulfilment of civic duties (e.g. children's obligation of compulsory education, payment of housing charges), where at least one member of the family is professionally active. In addition, it notes that some municipalities provide social housing and replacement housing, in addition to meeting the housing needs of low-income households, e.g. by paying out housing benefits. Whereas, in some municipalities with a relatively high number of Roma and lack of social housing, the purchase of flats/houses should be considered, based on an analysis and justification, prior work with the family and its readiness for integration.<sup>93</sup>

The Roma Civil Monitor highlights that the conditioning to aid families residing in the "poorest housing conditions" upon their willingness to integrate and fulfil civic obligations, such as children's mandatory attendance in education and the payment of housing charges, particularly when at least one family member is professionally active – is contradictory to the fundamental goal of providing housing assistance to those in need.<sup>94</sup>

# PORTUGAL



The number of Romani people in Portugal is difficult to estimate, since it is forbidden to collect statistics about race or ethnic categories in the country. According to data from Council of Europe's European Commission against Racism and Intolerance there are about 40,000 to 50,000 spread all over the country. According to the Portuguese branch of Amnesty International, there are about 30,000 to 50,000. The national High Commissioner for Migrations places the number at around 37,000.<sup>95</sup>

Roma communities in Portugal live in poverty, exclusion and discrimination, prejudice and stereotypes. In general, they live in precarious housing conditions, have low educational and professional qualifications, and face problems in accessing most public services, including health care, employment, education and training.<sup>96</sup>

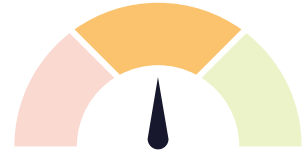
Portugal had an ongoing set of measures (strategy) on Roma until 2022 at the time of submission and therefore the government answered and submitted the Commission questionnaire in December 2021.<sup>97</sup> Because Portugal was late in submitting a renewed strategy in 2023, this assessment only looked at the old strategy (set of measures).

The old Portuguese Strategy does not mention environment, but it includes three specific measures and indicators in the area of housing in order to improve the housing conditions of Roma people and families, and eliminate spatial segregation, such as: implementation of the First Right Programme – a Programme supporting the Right to Housing, certification of housing and social housing neighbourhood infrastructures and carrying out awareness-raising initiatives aimed at landlords.

**ROMA COMMUNITIES IN PORTUGAL LIVE IN POVERTY, EXCLUSION AND DISCRIMINATION, PREJUDICE AND STEREOTYPES.**

**IN GENERAL, THEY LIVE IN PRECARIOUS HOUSING CONDITIONS, HAVE LOW EDUCATIONAL AND PROFESSIONAL QUALIFICATIONS, AND FACE PROBLEMS IN ACCESSING MOST PUBLIC SERVICES.**

# ROMANIA



**IT DOES NOT EXPLICITLY LOOK TO ADDRESS ENVIRONMENTAL RACISM AND ITS IMPACTS IN COMMUNITIES LIVING IN DEGRADED AND TOXIC ENVIRONMENTS.**

Council of Europe estimates that approximately 1.85 million Roma live in Romania, encompassing 8.32% of the population.<sup>98</sup> According to the Romanian strategy, “the proportion of Roma families living in unsanitary households (with leaking roof water, with damp walls or rot in window frames or on the floor) is 32%, and the share of those who accuse pollution, dirt or other environmental problems is 25%. More than 50% live in overcrowded houses, 16.5% live in buildings considered unsafe for housing and 30.3% in buildings that are in a visible state of visible deterioration.”<sup>99</sup>

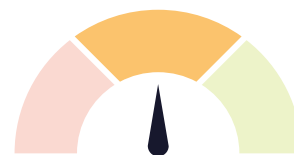
Romania submitted its Roma strategy and thematic action plans to the Commission in May 2022.<sup>100</sup> The Romanian strategy acknowledges environmental challenges impacting Roma communities, however it addresses them partially and mainly with regards to residential segregation, lack of access to utilities and transport affect housing conditions, social and sanitary housing. It does not explicitly look to address environmental racism and its impacts in communities living in degraded and toxic environments<sup>101</sup>, such as in the case of Pata Rât in Cluj-Napoca, Romania’s fourth largest city, which is Europe’s largest waste-related ghetto with approximately 1,500 people, mostly Roma, living in four different informal settlements around the Pata Rât landfill, situated a few kilometres away from the city centre.<sup>102</sup>

In addition, the accompanying housing action plan incorporates numerous measures for improving housing conditions and but with general indicators (e.g. ‘number of houses’, without specifying how many), which cannot be measured nor quantified or properly verified. These measures aim at a gradual improvement in housing quality, ensuring decent living conditions with adequate spaces for socialization, learning, and play. The plan also focuses on enhancing overall quality of life by addressing infrastructure issues, such as reducing the number of isolated communities without essential utilities. It emphasizes consistent financial allocations for infrastructure maintenance and the initiation of new investments. Furthermore, the plan aims to foster community cohesion, diminish attitudes and behaviours of marginalisation and stigmatisation, and facilitate easy access to basic utilities.

In parallel, the new strategy places a strong emphasis on improving documentation for housing purposes. It advocates for the inclusion of Roma communities in the government’s national cadastral program, aiming to provide clarity on the legal status of access roads within these communities. Additionally, it addresses the legal aspects of land ownership, crucial for the integration of Roma communities into Local Development Plans.



# SLOVAKIA



Slovakia has one of the largest Roma communities in Europe, estimated at around 400,000 people, or 8% of the overall population. Approximately 150,000 Roma in Slovakia live in extreme poverty and marginalisation, many in segregated rural settlements with missing infrastructure and missing or parallel low-quality public services.<sup>103</sup>

The majority of marginalized Roma households are situated in the Banská Bystrica, Prešov, and Košice regions, primarily on the outskirts of villages or towns (39% of the total). About one-third of Roma reside outside villages or towns, while 20% are located inside villages or towns.<sup>104</sup>

Slovakia submitted its strategy and action plan to the Commission in October 2021.<sup>105</sup> The Slovak strategy does not address environmental justice as such, however it includes an indicator on poverty energy (Share of households suffering from energy poverty). According to the Roma Civil Monitor, Despite mentioning alternative heating sources, the strategy does not adequately address the imperative to reduce emissions, especially within the broader context of energy security in terms of renewable energy. Additionally, concerning waste management, the Slovak Strategy outlines training activities on waste separation for helping professions but fails to address the lack of waste containers, leading to the illegal dumping of waste in the vicinity of marginalized Roma communities.<sup>106</sup>

In the area of housing, the strategy aims to increase the quality of housing in marginalized Roma communities, increase housing security of Roma, reduce the residential segregation of Roma and reduce discrimination against Roma in housing. Key challenges in this context involve addressing land settlement and eradicating residential segregation, ensuring inclusive rental housing and housing security for Roma, promoting energy literacy, and overall tackling environmental justice concerns.

According to the Roma Civil Monitor, the Strategy has the ambition of increasing the quality of housing, however the foreseen activities are not specific enough and it is not clear how they want to improve them. The continuation of constructing social rental housing and the launch of Housing First/Rapid Rehousing pilot projects aimed at tackling the homelessness of families with young children are seen as positive. However, the project<sup>107</sup> lacks measures in this area that would incentivise municipalities and towns and would significantly contribute to the construction of social housing with an inclusive approach.

**THE STRATEGY DOES NOT ADEQUATELY ADDRESS THE IMPERATIVE TO REDUCE EMISSIONS, ESPECIALLY WITHIN THE BROADER CONTEXT OF ENERGY SECURITY.**

**KEY CHALLENGES INVOLVE ADDRESSING LAND SETTLEMENT AND ERADICATING RESIDENTIAL SEGREGATION, ENSURING INCLUSIVE RENTAL HOUSING AND HOUSING SECURITY FOR ROMA, PROMOTING ENERGY LITERACY.**

# SLOVENIA



## AN INTER-DEPARTMENTAL WORKING GROUP FOR RESOLVING SPATIAL ISSUES OF THE ROMA.

The Roma community in Slovenia is estimated by the Council of Europe to be approximately 8,500 Roma or around 0.42% of the population.<sup>108</sup> In Slovenia, only a fraction of the Roma population living in Roma settlements has access to clean drinking water.<sup>109</sup> In early October 2022, the UN Special Rapporteur on the Environment expressed concern about the lack of access to drinking water in the Roma settlement of Dobruška.<sup>110</sup> In his 27th annual report, the Human Rights Ombudsperson emphasised that “inadequate legal and municipal services in Roma settlements pose a threat to the realisation of the human and special rights of the Roma community and its members” (27th Report of the Ombudsperson 2021:14).<sup>111</sup>

The Slovenian government submitted its strategy to the Commission on Roma in December 2021.<sup>112</sup> The Slovenian Strategy includes some components of environmental justice.

As such, the Slovenian government engaged into a comprehensive examination of housing issues in Roma settlements, including a thorough analysis, problem identification, and proposed solutions. This work is spearheaded by an interdepartmental working group dedicated to resolving spatial concerns for the Roma community. In the period 2017–2018, an interdepartmental working group for resolving spatial issues of the Roma, headed by the Slovenian Ministry of Environment and Spatial Planning (MESP), identified the needs and challenges related to development of Roma settlements and improvement of the living conditions and made proposals for legislative, organisational, financial and other measures to successfully address challenges in this area, presented in detail in the Final Report on the work of the interdepartmental working group for resolving spatial issues of the Roma No. 012-15/2017/366 of 17 January 2020.<sup>113</sup> The MESP advocates that legalisation of Roma settlements be carried out as part of the drafting of municipal spatial plans (MSPs) and their amendments; and development of municipal infrastructure in all settlements using European cohesion funds.

Based on the findings of the interdepartmental working group headed by the MESP, the Ministry of Agriculture, Forestry and Food intends to join the drafting of the Act Amending the National Farmland and Forest Fund Act, which will facilitate the process of legalisation of Roma settlements, especially in the part relating to agricultural land managed by the Farmland and Forest Fund of the Republic of Slovenia. The amendments to the act would enable the free transfer of ownership right to land plots whose intended use was previously changed into building land in order to legalise Roma settlements.

The collected data is expected to be integrated into the Spatial Information System. This integration will facilitate an in-depth understanding of spatial issues in specific municipalities and Roma settlements, enabling the formulation of a proposal for establishing a unified, systematically organized, periodically implemented, and methodologically coordinated database. This database will encompass a range of practices related to the development of Roma settlements, both domestically and internationally. It will also include relevant programs and projects within the EU that have been implemented or are currently underway for the Roma community.<sup>114</sup>

**IDENTIFIED  
THE NEEDS  
AND  
CHALLENGES  
RELATED TO  
DEVELOPMENT  
OF ROMA  
SETTLEMENTS.**

Additionally, the database will incorporate a compilation of binding international acts related to minimum standards in the field of housing.

Thus, the legalisation of Roma settlements will be carried out as part of the drafting of municipal spatial plans (MSPs) and their amendments; simultaneously with the drafting of MSPs and detailed municipal spatial plans (DMSPs), local communities must also prepare programmes for providing services as a basis for development of municipal infrastructure in all settlements. European cohesion funds will be used for this purpose, while funds for regional development are available in the state budget.

Despite its many positive aspects, according to the Roma Civil Monitor<sup>115</sup>, the strategy does not recognise discrimination against Roma in housing and the need for additional action to provide (desegregated) public housing for Roma.

## SPAIN

Approximately 725,000-750,000 Roma reside in Spain, with nearly half of this population concentrated in Andalusia. The remaining individuals primarily live in Catalonia, Valencia, and Madrid.<sup>116</sup>

Spain submitted its strategy to the Commission in November 2021.<sup>117</sup> Regarding housing, there has been overall improvement compared to data preceding the previous Strategy. Progress is evident in the reduction of shantytowns and substandard housing, although these challenges persist among Roma households. Varying degrees of enhancement are observed in access to basic amenities within dwellings, the quality of housing, and the infrastructure and urban features of the environments where Roma households are situated. Notably, there is a decrease in the number of Roma households facing damp problems (now at 16%) and those experiencing overcrowding or over-occupation (8.9% of the total). However, the COVID-19 pandemic crisis has resulted in setbacks and a deterioration of the housing situation for Roma, particularly among those still living in substandard housing or settlements.

The Spanish Strategy<sup>118</sup> includes components of environmental justice through energy security and clear targets to reduce housing segregation and access to essential services. The strategy intends to mainstream and align with the National Strategy against Energy Poverty 2019-2024 so that Roma families who are considered vulnerable consumers benefit from the measures to reduce energy poverty contained therein. Furthermore, as part of the National Strategy against Energy Poverty (2021-2024), there will be a focus on implementing structural and energy efficiency measures. These measures aim to enhance the equipment and conditions of buildings and homes for vulnerable consumers, including Roma. Additionally, the strategy will incorporate additional protection measures for consumers facing vulnerability, along with initiatives to improve information and training mechanisms. The goal is to enhance understanding of rights, obligations, and alternatives in the realm of energy consumption.



**FOCUS ON  
IMPLEMENTING  
STRUCTURAL  
AND ENERGY  
EFFICIENCY  
MEASURES.**

Likewise, general awareness actions will be carried out on the need to reduce energy poverty and information on measures will be disseminated in different media, formats and language accessible to vulnerable groups. From the scope of the intervention, advice will be offered on saving measures, energy efficiency, consumption habits and content of the electricity bill to provide the Roma population and other vulnerable groups with management tools and optimization of energy consumption.

To safeguard supply services during pandemic situations and ecological catastrophes, the Ministry of Transport, Mobility and the Urban Agenda will coordinate its actions with the Ministry for the Ecological Transition and the Demographic Challenge, with measures that affect the environment and habitability conditions of the homes of the population at risk or in a situation of social exclusion, including the Roma population.

The Strategy establishes the priority of reducing residential segregation, currently measured at 2.9%, to 1.9% in 2025, and to reduce to one-third (1%) by 2030. It also calls for the eradication of slum settlements and inadequate housing by 2030. In terms of guaranteeing essential services, the strategy finds that 27% of households have access to heating and proposes raising this to 38% in 2025 and 50% in 2030. The strategy applies a cross-cutting focus on the fight against antigypsyism, leading in this case to a focus on discrimination in access to housing, although it does not propose specific measures in this area beyond the implementation of programmes and seminars, or the monitoring of offences recorded in this area.

THE STRATEGY ESTABLISHES THE PRIORITY OF **REDUCING RESIDENTIAL SEGREGATION**, CURRENTLY MEASURED AT 2.9%, TO 1.9% IN 2025, AND TO REDUCE TO ONE-THIRD (1%) BY 2030. IT ALSO CALLS FOR THE **ERADICATION OF SLUM SETTLEMENTS AND INADEQUATE HOUSING** BY 2030.



# SWEDEN



MEASURES  
TO BOOST  
EFFECTIVE  
AND EQUAL  
ACCESS TO  
SUITABLE,  
NON-  
SEGREGATED  
HOUSING  
AND ACCESS  
TO QUALITY  
HEALTHCARE  
AND SOCIAL  
SERVICES.

Though traditionally nomadic, the majority of Roma in Sweden now lead settled lives. This community is diverse, encompassing approximately 20 dialects of the Romani language currently spoken in Sweden. Of the estimated 50,000 Roma residing in Sweden, around 25,000 are descendants of an initial migration wave in the early sixteenth century, while the remaining population hails from various groups that arrived since the beginning of the twentieth century.<sup>119</sup>

The Roma in Sweden often live in deprived areas with low socioeconomic status. Many Roma have difficulty getting access to apartments due to racial discrimination and prejudice and so often they look for a place to live close to other Roma to help each other through informal networks. Sweden has an elaborate and generous social welfare system with a generally well-developed safety net designed to meet the needs and fulfil citizens' rights but the Roma mostly still 'fall between the cracks' and have to depend on each other.<sup>120</sup>

With the adoption of the 2020 EU Roma Framework, the government claimed that Sweden's ten-year-old strategy, which goes until 2032, is already in line with the new framework and that any alteration to its ongoing strategy is not necessary. The ongoing Swedish strategy includes certain environmental justice proxies, including measures to boost effective and equal access to suitable, non-segregated housing and access to quality healthcare and social services. However, the strategy lacks specific indicators for measuring progress and outcomes. The EU Roma Framework advocates for enhanced target-setting, data collection, monitoring, and reporting, aiming for policies with measurable objectives and evidence-based follow-ups, among other improvements.

## Good practice

As a good example from the implementation of the ongoing strategy, the National Board of Housing, Building and Planning produced a guidance material for property owners and landlords to raise their awareness of the situation of Roma people on the housing market and to combat discrimination. This work has been carried out together with a network of Roma representatives and representatives of property owners and landlords. Training is offered free of charge and provided at the premises of interested housing companies, with Roma educational leaders holding group discussions as part of these courses.

# Conclusion and recommendations

Based on the findings of the country assessments, it is evident that Member States must do more in order to prioritize environmental justice in their upcoming national Roma strategies, while investing in a comprehensive understanding and approach to environmental justice as a whole in Roma and Traveller communities in connection with fighting antigypsyism.

While awaiting the mid-term evaluation of national Roma strategies by the European Commission in 2025, Member States should use the time to address existing shortcomings at the level of proposed objectives, measures and indicators pertaining to environmental justice or its related aspects (in housing and access to basic utilities) in both national strategies and action plans.

Broader questions around political will of Member States remain regarding budget allocations for the implementation of proposed measures. At the time of adopting their national strategies, largely, Member States did not provide a clear and complete map of the funding allocations under national or EU funding, in part because budget negotiations were still ongoing.

Going forward, more political commitment is needed from all Member States to understand the environmental burdens and impacts on Roma and Traveller communities at national level through

mapping and specific environmental impact data collection in a disaggregated and intersectional manner. This will be the optimal basis for proposing effective and meaningful measures and programmes that address environmental impacts and inequalities specifically and cross-cuttingly in the national Roma strategies.

When formulating measures concerning environmental justice, it is imperative to establish a direct connection between combatting antigypsyism and addressing the repercussions of environmental discrimination, along with the absence of environmental services, on the overall well-being of Roma and Travellers. This nexus extends to the profound impact of spatial segregation in many Roma and Traveller neighbourhoods, acting as a fundamental cause of environmental discrimination with intricate ties to thematic areas such as housing, health, employment, and education.

It's essential to consider various factors, including the prevention of forced evictions, the limited access to living areas with green spaces, among others. These factors contribute significantly to the disparate health outcomes experienced by Roma and Traveller communities when compared to the majority population, emphasizing strong interconnections with the thematic area of health.





Occupational health and safety, particularly when working in environmentally challenging conditions, such as informal waste picking, expose Roma and Travellers to additional environmental health risks. This relates closely to the thematic area of employment.

Furthermore, measures should be implemented to secure procedural rights for Roma and Traveller communities in environmental matters. This encompasses the right to information, the right to participate in decision-making processes regarding environmental concerns, and access to justice when these rights are inadequately granted as indicated by the Aarhus Convention which all member states ratified. Addressing these aspects comprehensively will contribute to a more inclusive and just environmental framework for Roma and Travellers.

Finally, in the adoption or implementation of policies related to environmental justice for Roma and Travellers, Member States should employ both a targeted and mainstreaming approach. This involves aligning Roma policies with broader environmental and social policies, adhering to EU standards and policies that are most relevant to achieving environmental justice. This includes, but is not limited to, compliance with the Environmental Rights and Aarhus Convention, European environmental law, with particular attention to directives such as the EU Drinking Water Directive, EU Water Framework Directive, Industrial Emissions Directive, Ambient Air Quality Directive, Environmental Impact Assessment Directive, Strategic Environmental Assessment Directive, and the EU Waste Framework Directive. This approach ensures a comprehensive and integrated strategy that addresses environmental justice within the larger framework of European standards and regulations. By doing so, Member States can contribute significantly to fostering environmental justice and improving the well-being of Roma and Travellers in the European Union.



## Endnotes

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- 17 The Roma Civil Monitoring (RCM) 2021-2025 initiative is implemented by a consortium of highly acknowledged organisations working internationally for Roma equality, participation and inclusion at the international level: Democracy Institute of the Central European University (CEU, project leader), ERGO Network, Fundación Secretariado Gitano (FSG) and European Roma Rights Centre (ERRC). It builds on the lessons learnt and good practice from the RCM pilot project 2017-2020. More information about RCM is available at: <https://romacivilmonitoring.eu/>
- 18 Roma equality, inclusion, and participation by EU country (europa.eu)
- 19 Annex to the Assessment report of the Member States' national Roma strategic frameworks
- 20 Austria National Strategy on Roma equality, participation and inclusion.
- 21 Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Austria
- 22 Belgium's National Roma Strategic Framework
- 23 Annex to the Assessment report of the Member States' national Roma strategic frameworks
- 24 Bulgaria's National Strategy for Roma integration
- 25 Annex to the Assessment report of the Member States' national Roma strategic frameworks
- 26 Civil society monitoring report on the quality of the national strategic framework in Bulgaria
- 27 Croatia's National Strategy for Roma inclusion
- 28 Ibid.
- 29 Ibid.
- 30 Civil society monitoring report on the quality of the national strategic framework in Croatia
- 31 Civil society monitoring report on the quality of the national strategic framework in Cyprus
- 32 Cyprus' National Strategy for Roma inclusion Portal
- 33 Cyprus' National Strategy for Roma inclusion Document
- 34 Civil society monitoring report on the quality of the national strategic framework in Czechia
- 35 Second European Union Minorities and Discrimination Survey Roma – Selected findings
- 36 These include the Social inclusion strategy 2021 – 2030, the National strategy for the development of social services 2016 – 2025, Concept of social housing of the Czech Republic 2015–2025, Regional Development Strategy of the Czech Republic 2021, Housing concept of the Czech Republic until 2020 (revised), A strategy dealing with horizontal issues 2020, Territorial Development Policy of the Czech Republic, etc.
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- 45 Civil society monitoring report on the quality of the national strategic framework in Finland
- 46 Ibid.
- 47 Ibid.
- 48 Civil society monitoring report on the quality of the national strategic framework in France
- 49 France National Strategy for Roma inclusion Document
- 50 French National Strategy for Roma inclusion Portal
- 51 Civil society monitoring report on the quality of the national strategic framework in Germany
- 52 German National Strategy for Roma inclusion Portal
- 53 The Federal Republic of Germany, as a federal state, consists of sixteen states (German: Länder, sing. Land; colloquially also (sing.) Bundesland/(pl.) Bundesländer, "Federate State/s"). Berlin, Hamburg and Bremen (with its seaport exclave, Bremerhaven) are called Stadtstaaten ("city-states"), while the other thirteen states are called Flächenländer ("area states") and include Bavaria, Saxony, and Thuringia which describe themselves as Freistaaten ("free states").
- 54 German National Strategy for Roma inclusion Document



- 55 Ibid.
- 56 [Civil society monitoring report on the quality of the national strategic framework in Greece](#)
- 57 Ibid.
- 58 [Greek National Strategy for Roma inclusion Portal](#)
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- 60 [Hungarian National Strategy for Roma inclusion Portal](#)
- 61 [Civil society monitoring report on the quality of the national strategic framework in Ireland](#)
- 62 [Irish National Strategy for Roma inclusion Portal](#)
- 63 Ibid
- 64 [Irish National Strategy for Roma inclusion Document](#)
- 65 [Civil society monitoring report on the quality of the national strategic framework in Italy](#)
- 66 [Italy National Strategy for Roma inclusion Portal](#)
- 67 [Italy National Strategy for Roma inclusion Document](#)
- 68 [Civil society monitoring report on the quality of the national strategic framework in Latvia](#)
- 69 [Latvia National Strategy for Roma inclusion Document](#)
- 70 [Latvia National Strategy for Roma inclusion Portal](#)
- 71 [Civil society monitoring report on the quality of the national strategic framework in Lithuania](#)
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- 91 For the sake of cohesiveness, we will refer to the set of measure “The Strategy”.
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