

## **SUMMARY**

*Finnish Property Owners Rakli (Transparency Register id 727236253172-92) is the most prominent association of professional property owners such as those holding residential and commercial properties and infrastructure, real estate investors and construction clients in Finland. Rakli's members span across various types of residential rental property owners: non-profit rental and right of occupancy housing companies and foundations, free-market rental providers as well as institutional investors such as pension insurance companies.*

### **Subsidiarity-based approach to housing**

Finnish Property Owners Rakli welcomes the opportunity to participate in the Call for evidence for the State aid - revision of rules on services of general economic interest, in particular on housing.

As a general observation, Rakli highlights that current housing-related challenges recurring across Europe can, to some extent, be described as shared challenges from a European perspective. However, the fact that similar challenges exist in multiple countries is not sufficient reason to abandon the EU's subsidiarity-based approach to housing policy. The conditions for housing policy vary between countries. Solutions to challenges should therefore primarily be designed at the national level.

### **Current SGEI rules enable affordable housing market conditions**

The example of the Finnish housing market that we present in this document further ahead provides evidence that just and affordable housing market conditions can be achieved by national regulation within the boundaries set by the existing EU state aid regulation.

The common statement of Nordic property owners' associations (see below) also reminds that public authorities in member states can already subsidize housing and they do not need to notify such activity to the Commission, if it is restricted to "the provision of social housing for disadvantaged citizens or socially less advantaged groups, who due to solvency constraints are unable to obtain housing at market conditions" (Recital 11, SGEI Decision).

That restriction is fundamental. Clear delimitation of the scope of social or affordable housing as a SGEI allows the Commission to assess the respect of state aid rules. It ensures that the state-subsidized housing is targeted to those most in need. At the same time, it gives sufficient leeway to member states to define how and when subsidized

housing responds to a public need. State aid must continue to be rigorously focused on the provision of affordable housing for those unable to access it at market conditions, no matter what the legal status of the provider is. This ensures that public funding granted for the provision of such services does not unduly distort competition on national and local housing markets.

European rules on SGEI must continue to provide legal certainty to energize all European Internal Market actors to compete in increasing the supply, quality and affordability of European housing stock.

To improve the situation on the housing market, it is essential to make the market function properly. In this context, loosening the rules on SGEI rather disrupts the market's functionality.

### **Finnish housing market as an example**

We suggest creating a just and affordable housing market can be promoted with several policies. As an example, the Finnish residential markets stand out with reasonable pricing and availability, both for rental and owner-occupied dwellers. The privately financed residential rental market is complemented by the social housing segment, that provides apartments for low-income residents, such as single-parent families and special groups.

The favorable housing market conditions are due to the four fundamental housing market policies, that have made the Finnish residential market attractive and accessible for tenants, homeowners, public and private landlords and institutions providing social housing:

- Rent regulation ranks amongst the most liberal in Europe
- General housing allowance
- State-subsidized housing for low-income families and special groups
- Land use, Housing and Transport Agreements between cities and the state

Also, several factors in land use planning and construction regulation affect the availability of housing and interest to invest, for example availability of land being a usual bottleneck for construction. Thus, streamlining local planning and permission processes as well as investing in the infrastructure within and between the city regions can accelerate housing production.

As attached you can find two documents: a memo *Solving the housing crisis: the Finnish Model* with background information and policy recommendations, as well as a joint letter of Nordic property owners' associations.

As an association representing various types of rental property owners, we are delighted to take part in discussions on housing in the future as well.

Finnish Property Owners Rakli

Transparency Register id 727236253172-92

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**Attachments (below):**

1. Solving the housing crisis: the Finnish Model
2. Joint letter of Nordic property owners' associations.

# Solving the housing crisis: the Finnish Model

The Finnish residential markets stand out with reasonable pricing and availability, both for rental and owner-occupied dwellers. The privately financed residential rental market is complemented by the social housing segment, that provides apartments for low-income residents, such as single-parent families and special groups. As a result of long-term work, there is virtually no homelessness in Finland.

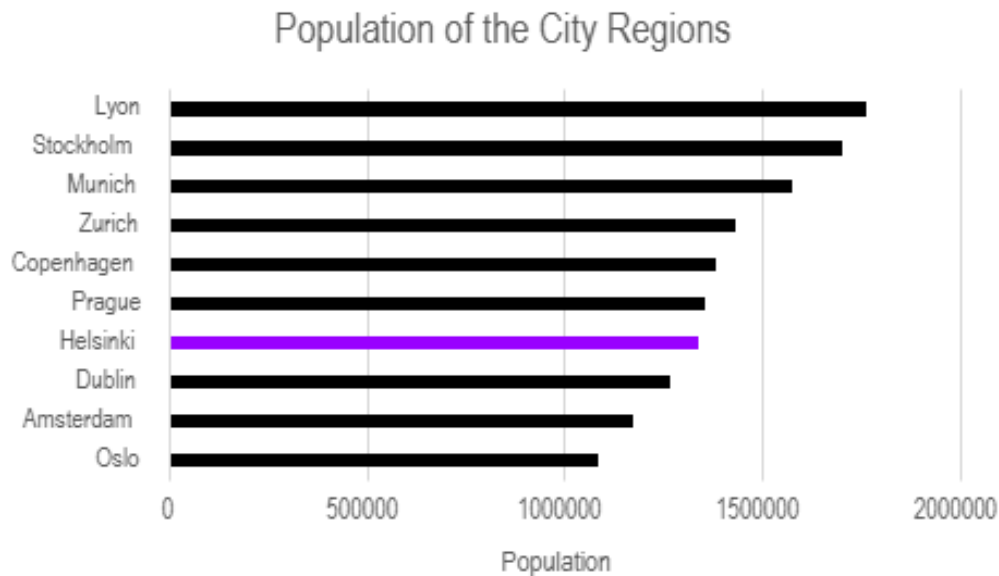
The Finnish case we present in this paper provides evidence that just and affordable housing market conditions can be achieved by national regulation within the boundaries set by the existing EU state aid regulation.

**We propose that the favourable housing market conditions are due to the four fundamental housing market policies, that have made the Finnish residential market attractive and accessible for tenants, homeowners, public and private landlords and institutions providing social housing:**

- 1. Rent regulation in Finland ranks amongst the most liberal in Europe**
- 2. General housing allowance**
- 3. State-subsidized housing production for low-income families and special groups**
- 4. Land use, Housing and Transport Agreements between the largest cities and the state**

## Housing market in Greater Helsinki

The urban area we refer here as Greater Helsinki is comprised of four municipalities that form the capital region of Finland. The population in the area is approx. 1,3 million. In terms of population, Zurich, Copenhagen, Prague and Dublin are comparable European capital cities.

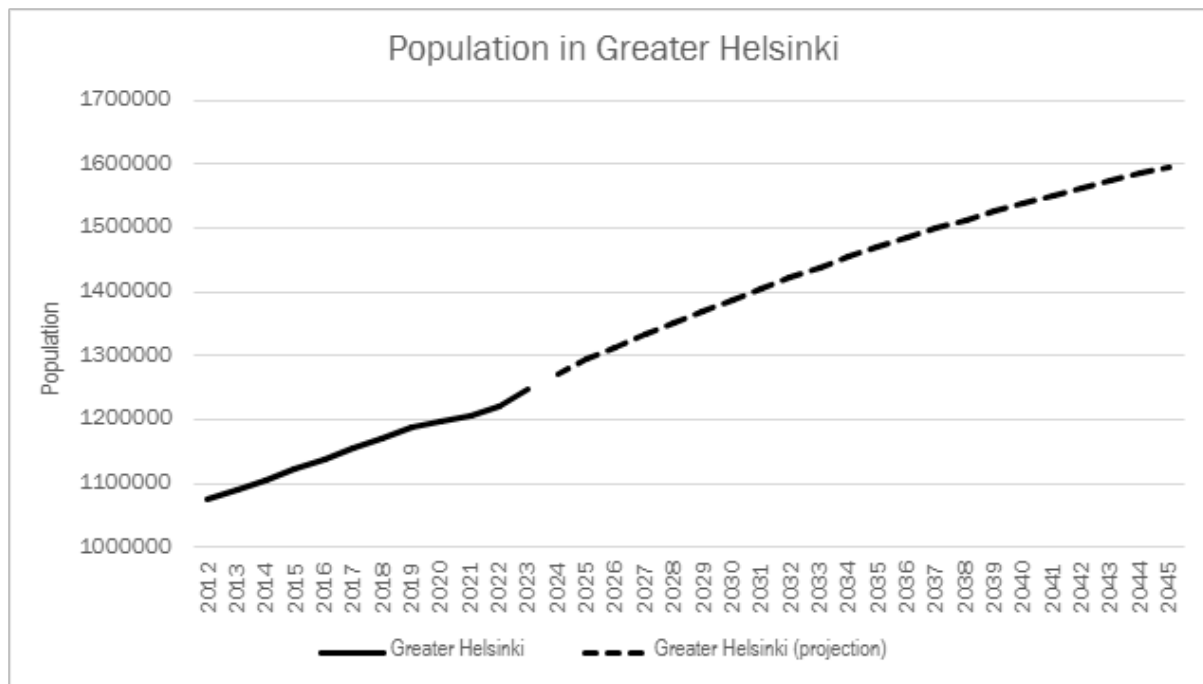


*Figure 1: Greater Helsinki and comparable European cities. Source: World Population Review*

Population growth is steady, as shown in figure 2: While the growth plateaued during the COVID-epidemy, it has picked up again due to high immigration and expected to meet the long-term trend in the forthcoming years. The population is expected to grow by 10 % by 2030 and to exceed 1,5 million by 2040. Immigration and urbanization are the drivers of growth (figure 3). While Helsinki is not amongst the highest growing urban areas in Europe (such as Stockholm), the long-term growth (approx. 30 % by 2050) is still relatively high and comparable to the growth of Vienna, Budapest, Prague, Munich, Bologna and London.<sup>1</sup>

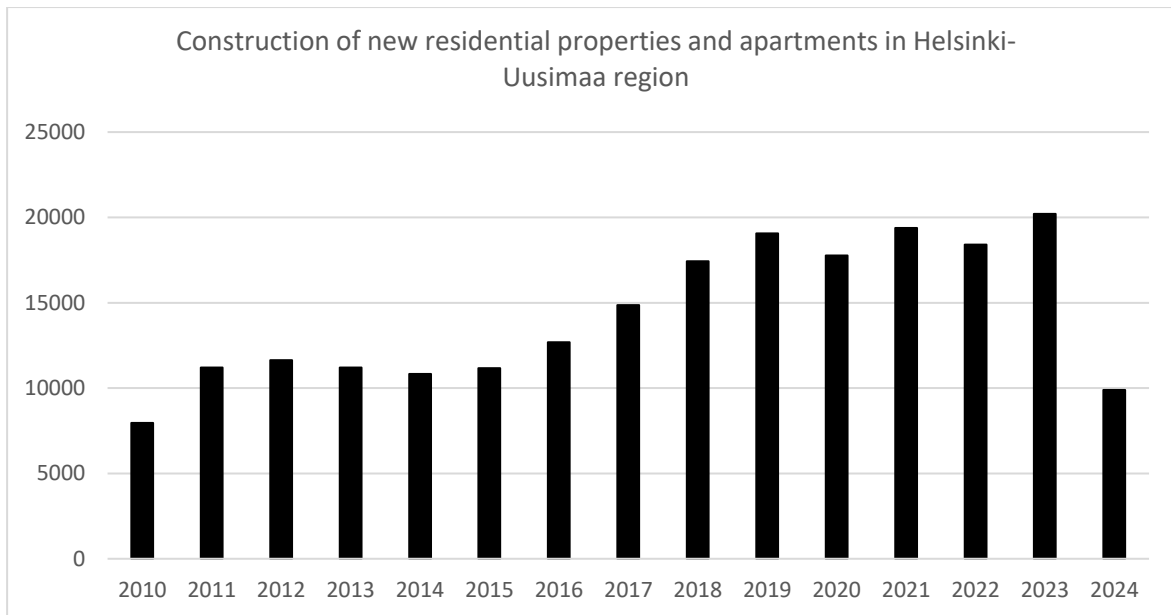
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<sup>1</sup> Source: [https://joint-research-centre.ec.europa.eu/jrc-mission-statement-work-programme/facts4eufuture/future-cities-opportunities-challenges-and-way-forward/increasing-or-declining-urban-populations-future-cities\\_en](https://joint-research-centre.ec.europa.eu/jrc-mission-statement-work-programme/facts4eufuture/future-cities-opportunities-challenges-and-way-forward/increasing-or-declining-urban-populations-future-cities_en)



*Figure 2: Population growth in Greater Helsinki. Source: Statistics Centre of Finland*

The number of apartments in Greater Helsinki is approximately 660 000, of which 350 000 are owner-occupied (53 %) and 290 000 (44 %) are rental apartments. Roughly 100 000 rental apartments are rent-controlled social housing. In the Helsinki-Uusimaa region (of which Greater Helsinki is 2/3 in terms of population), new construction has increased during the last 10 years from approx. 11 000 (2014) to over 20 000 (2023) (figure 3). Private investment into residential real estate has supported the growth: During the last 10 years, roughly 16 billion euros has been invested in Finnish residential assets (figure 4). The Land use, Housing and Transport Agreements have been instrumental in ensuring the sufficient share of land for residential construction.



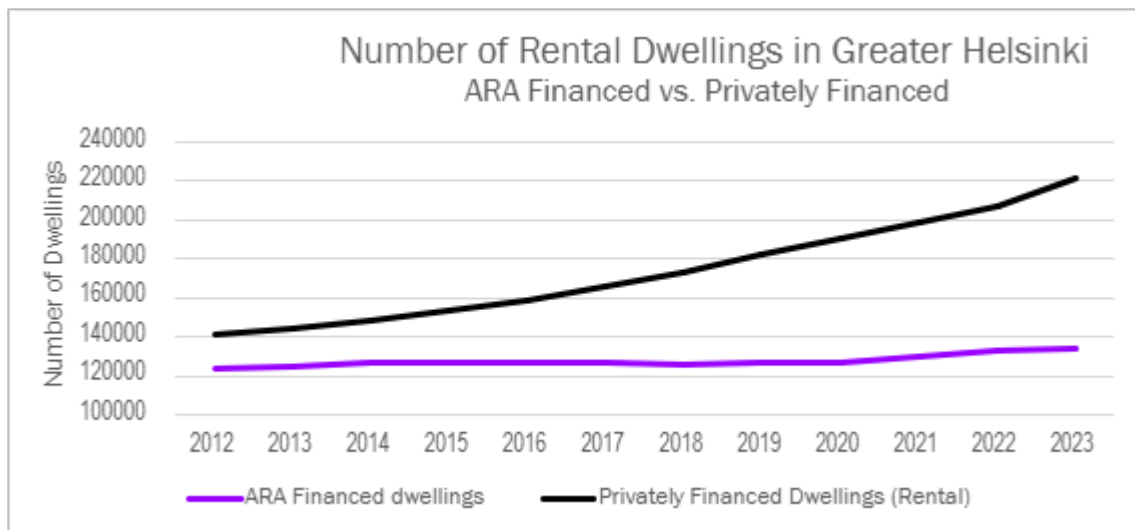
*Figure 3: Construction of new residential properties and apartments in Helsinki-Uusimaa region. Source: Statistics Centre of Finland*



*Figure 4: Private Residential investment volume in Finland. Source: KTI Finland*

The supply of new rental apartments in Greater Helsinki has been steady during the last 10 years as shown in figure 5: The number of free-market rental apartments has grown from 140 000 in 2012 to over 220 000 in the

end of 2023. At the same time, the amount of rent-controlled social housing has increased only slightly.



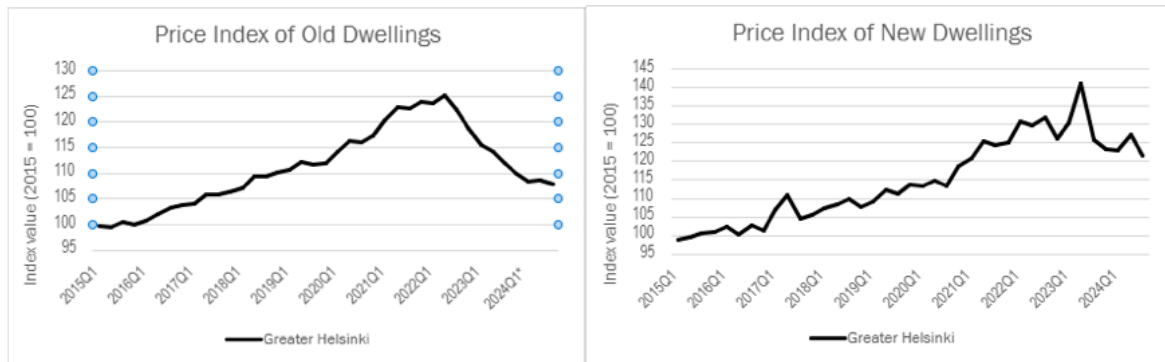
*Figure 5: Number of Rental Dwellings in Greater Helsinki. Source: Finnish Environment Institute*

The volume of new construction has kept the cost of living at bay: Inflation, the cost of old (figure 6) and new dwellings (figure 7) have not increased in ten years. The same applies to living costs for rental dwellers: As shown in Figure 8, both market rents and state-subsidized rents have increased roughly at the rate of inflation during the last 10 years. The rent increase in the subsidized part of the housing market exceeded the annual increase of free market rents in the period of high inflation (2022-2023) despite full indexation of free market rents, because of highly competitive market environment.<sup>2</sup>

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<sup>2</sup> The official statistics fail to capture the effect of incentives on the rental cost. Currently, there are widely spread market practices of 1-2 rent-free months per 12 months agreement, which indicates that the effective rents may be close to 10 % under the official statistics.





Figures 6 and 7: Price Index of Old and New Dwellings, respectively. Source: Statistics Centre of Finland

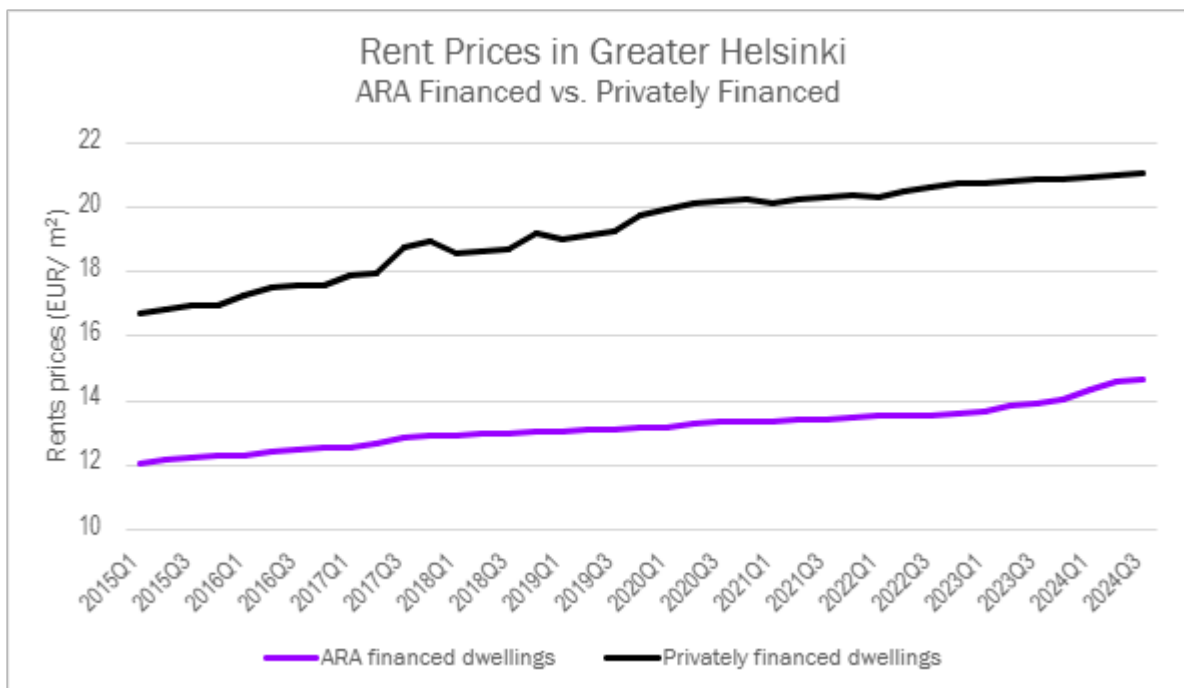
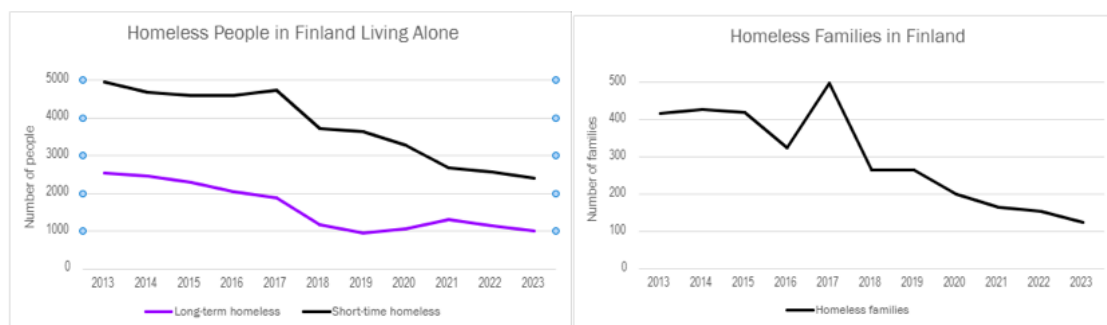


Figure 8: Rent Prices in Greater Helsinki. Source: Statistics Centre of Finland

The current availability of dwelling is on a good level: The housing market in December 2024 is rather stagnant, especially for new apartments, and the number of listings is currently close to their all-time highs.<sup>3</sup> The availability of rental apartments is also on a good level: The number of listings in December 2024 exceeds 11 000. While there are no long-term statistics available, this number of vacant apartments is significant in absolute terms as it can accommodate two to three years net population growth.

<sup>3</sup> In addition, the purchasing conditions are improving with the falling rates. Despite the preference for short market rates, the average interest rate on new mortgages has fallen below the EU average during the fall of 2024.

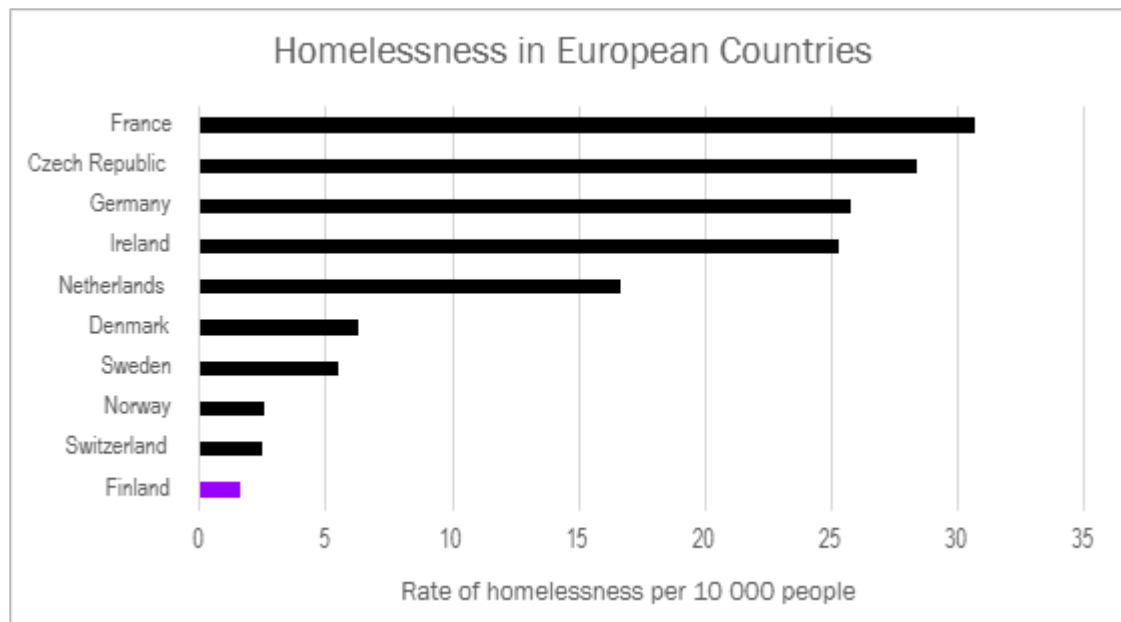
Homelessness in Finland has decreased significantly during the last ten years (figures 9 and 10)<sup>4</sup>. Finland has achieved a low homelessness rate (figure 11) through a combination of effective policies and social initiatives. Housing in the country remains relatively affordable, with good availability even in the largest cities. To support low-income households, the general housing allowance helps cover rental payments, ensuring access to stable housing. Additionally, state-subsidized rental housing production is targeted at the most vulnerable groups in the housing market, including low-income families, the elderly, students, and people with disabilities.



*Figures 9 and 10: Homeless Individuals and Families in Finland, respectively.*

*Source: The Housing Finance and Development Centre of Finland, ARA*

<sup>4</sup> The new statistic published on 10<sup>th</sup> February 2025 showed, that short-term homelessness for people living alone increased by 377 individuals in 2024. However, long-term homelessness and homelessness for families continued on a decreasing trend.



*Figure 11: Homelessness in European Countries. Source: RAKLI*

Homelessness among individuals struggling with substance abuse has also been reducing significantly through the implementation of the Housing First principle. This approach prioritizes providing permanent housing as a foundation for recovery. The Housing First is highly effective in reducing chronic homelessness and improving housing stability. While the initial investment may seem significant, Housing First can ultimately be more cost-effective than traditional approaches that often involve repeated cycles of homelessness and emergency services.

## Rent regulation

In Finland, renting an apartment is based on laws and market practices<sup>5</sup> that define the rights and responsibilities of landlords and tenants. Rental agreements can be either fixed-term or non-fixed and should include details like rent amount, payment terms, lease duration, and any rent increase conditions. Rent is typically paid monthly, and landlords may

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<sup>5</sup> Key landlord and tenant associations have agreed on recommended rental practices, called Fair Rental Practices. Fair rental practices are recommended for residential leases especially if the parties have not agreed anything on possible upcoming issues and the law does not state anything specific on a certain issue. However, if the parties have agreed on practices regarding the lease, they are followed according to the agreement. Source: Finnish Landlord Association

require a security deposit, usually equivalent to 1–3 months' rent (3 months' rent is the maximum).

Tenants have the right to receive the apartment in the agreed-upon condition and are responsible for its upkeep. They are only liable for damage caused by their own negligence, while major repairs are the landlord's responsibility. The landlord has the right to inspect the apartment periodically to ensure it is well-maintained and safe.

Lease termination terms vary by agreement type. Open-ended leases require a one-month notice period from tenants, while landlords must provide 3–6 months' notice. Fixed-term leases cannot be terminated before the end date without a valid reason. Rental demand varies by location, with higher rental prices typically seen in the Helsinki metropolitan area.

The Act on Residential Leases regulates all rental agreements, and in cases of dispute, tenants and landlords may seek assistance from consumer advisors or legal aid. Rental apartments are listed on various rental portals, and low-income renters may qualify for housing benefits through the Social Insurance Institution of Finland(Kela).

The following table (table 1) highlights the key aspects of residential rental regulations in Finland, Sweden, Denmark, Germany, Switzerland, the Netherlands, the Czech Republic, Ireland, France, and Norway. This covers areas such as rental agreement types, rent control, security deposits, termination notice periods, and tenant protection policies.

Country	Rental Agreement Types	Rent Control	Security Deposit	Notice Period (Tenant)	Tenant Protection Policies
Finland	Fixed-term and non fixed-term	No general rent control	1-3 months' rent	1 month for non fixed-term	Strong protection, but market-based pricing
Sweden	Fixed-term, with tenants often gaining rights to renew	Extensive; rents negotiated via tenant organizations	Max 3 months' rent	1-3 months (depends on lease length)	High tenant protection, strong rent regulation
Denmark	Mostly non fixed-term, with some fixed-term	Rent control applies for older buildings	Max 3 months' rent	3 months for non fixed-term	Strong; rent set by "utility value" in older units
Germany	Mostly non fixed-term, fixed-term for limited cases	Regulated; rent increase limits apply	1-3 months' rent	3 months, increases with tenancy length	Strong protection, moderate rent regulation
Switzerland	Mostly non fixed-term, fixed-term available	Rent can increase with inflation; approvals needed	1-3 months' rent	3 months, varies by region	High tenant rights, but moderate rent control
Netherlands	Non fixed-term and fixed-term	Rent control applies for units below certain price point	Max 3 months' rent	1 month for fixed-term	High tenant protection in regulated sector

Czech Republic	Fixed-term and non fixed-term	Limited; market sets rents	1-2 months' rent	1-3 months depending on lease	Moderate protection, mainly market-driven rents
Ireland	Non fixed-term after 6 months	Rent increases capped in "Rent Pressure Zones"	Max 1 month's rent	28 days (first 6 months), then varies by duration	Moderate protection, strong rent regulation in urban areas
France	Fixed-term and non fixed-term	Rent controls in large urban zones	1 month's rent (unfurnished)	1-3 months based on property type	High tenant protection, strong rent control in cities
Norway	Non fixed-term, fixed-term allowed	No strict rent control	Max 6 months' rent	1 month for non fixed-term	Strong protection, market-driven with rent adjustment limits

*Table 1: International comparison of rent regulation*

**Key Observations:**

- **Rent Control:** Sweden, Denmark, and France have strong rent control, especially in urban or regulated housing markets. Germany, Switzerland, and Ireland also have rent controls, but they are more moderate. In contrast, Finland, Norway, and the Czech Republic have less strict rent controls, largely allowing market-driven rents.

- **Security Deposits:** Security deposits generally range between 1 to 3 months' rent across countries, with Norway allowing up to 6 months' rent.
- **Tenant Protection:** Sweden, Denmark, Germany, France, and the Netherlands generally offer higher tenant protections, including rent controls and long notice periods for landlords. Finland and Norway provide strong protections but allow for more market-based rents, while Czech Republic's and Ireland's protections are moderate.
- **Notice Periods:** Most countries have a one-month minimum notice period, with longer periods typically required, the longer the tenancy. Germany's notice period is notably tenant-friendly, scaling with tenancy duration.

### **General housing allowance**

General housing allowance is a benefit paid by Kela (the Social Insurance Institution of Finland) to individuals who need financial support to cover their housing costs. The purpose of the allowance is to alleviate the financial burden caused by housing expenses.

General housing allowance can be granted to individuals whose income is low in relation to their (reasonable) housing costs. The benefit is intended for people who permanently reside in Finland. General housing allowance can be used for covering various housing costs, such as rent paid for a rented apartment and related water and heating costs.

The amount of housing allowance is calculated individually based on the applicant's income and expenses. The amount of the allowance may vary depending on factors such as income, family situation, and housing costs.

### **State-subsidized rental housing**

Finland's housing production support system is a comprehensive framework developed to enhance the availability of affordable housing and improve housing quality. It involves collaboration between the government, municipalities, and private entities.

## Key Objectives

- **Promoting Affordable Housing:** The system aims at making affordable housing accessible to those in need due to their socio-economic circumstances.
- **Improving Housing Quality:** It focuses on fostering energy-efficient and environmentally friendly construction.
- **Balancing the Housing Market:** By addressing housing demand and supply, the system ensures a diverse supply of housing options.

Production support specifically targets vulnerable groups, including the elderly, students, individuals with disabilities, those recovering from mental health or substance abuse challenges, and people at risk of homelessness. This support aims to secure affordable, safe housing that accommodates independent living and offers necessary support services.

## Main Forms of Support

- **Financing:** Centre for State-Subsidised Housing Construction under the Ministry of the Environment offers state-guarantees for loans, interest subsidies, and construction grants.
- **Municipal Grants:** Municipalities provide various incentives for housing projects, including reduced-cost land.
- **Steering Financing:** The state allocates steering funds for projects focused on housing innovation and quality improvement, such as grants for improving accessibility and to retrofit elevators.
- **ASP loan in Finland** offers first-time homebuyers aged 15–44 affordable mortgages with state guarantees, tax-free interest, and optional interest subsidies.

## **Land use, Housing and Transport Agreements between the largest cities and the state**

Land use, Housing and Transport Agreements are a series of agreements between the state and seven largest city regions. Under the agreements, the parties agree and coordinate the planning and production of housing and residential land, as well as development of supportive transport



infrastructure to provide the means for sustainable urban transport. In practice, the state agrees to provide partial funding for infrastructure projects, in exchange for the largest urban regions to meet the targets of land-use plans and housing production. In the past, the agreements also included a target production allotment for state-subsidized social housing.

In Greater Helsinki, the infrastructure funded under the agreements include numerous urban and light urban rail lines, two subway line extensions and relocating the freight harbour from Helsinki city centre to Vuosaari (in eastern fringe of Helsinki). All the projects have been built within the existing urban structure, allowing infill developments to densify the urban areas and relieving pressure for the city to grow outwards.

It is challenging to estimate the actual impact of the agreements on housing production. However, the major increase in housing production since 2016 (as shown in figure 3) timely matches the agreement in 2012, when the first agreement was made in its current form between the state and Greater Helsinki.

## **Policy recommendations and best practices**

Several factors in land use planning and construction regulation affect the availability of housing, for example availability of land being a usual bottleneck for construction. Thus, streamlining local planning and permission processes as well as investing in the infrastructure within and between the city regions can accelerate housing production.

For example, in Finland, municipalities hold a planning monopoly, meaning that planning decisions are made solely by the municipality. Real estate development, particularly when modifying plans, carries significant risks, as processes typically take a long time.

There are successful approaches that can be used as best practices. One of these examples is above mentioned Land use, Housing and Transport Agreements that have generated housing production and infrastructure

investments. Also, other measures related to land use planning are worth considering:

- **A limited right to appeal fastens the processes**

If the right to appeal the final planning decision is not limited to the project's stakeholders or interest groups, anyone can file an appeal regarding the content of the plan or the process. Appeals typically take several years to be processed through various levels of the judicial system.

The right to appeal can be limited to property owners of the neighbouring properties and others directly affected by the plan, and thus processes can be fastened.

- **The level of development compensation can encourage infill development**

In Finland, property owners are often required to pay a tax-like fee, known as development compensation, which can be up to 60% of the calculated increase in the value of the land resulting from the changed plan. The development compensation can be due immediately upon the plan being confirmed, even if the municipality carries out the necessary infrastructure works, such as building road connections, only years later.

The level of development compensation should be fixed in relation to the actual cost for the municipality to build the public infrastructure in the area. This would encourage infill development of new residential projects as the compensation could be lower due to existing infrastructure. Also, the owner of the plot should not need to pay the compensation until the required public works are well in progress.

- **Visibility of the costs caused by planning requirements can increase affordability**

Currently in Finland the costs related to planning requirements are not part of the information decision makers are given upon the plan is decided. An assessment of cost related to the planning requirements should be carried out as a standard part of any project, to make the costs visible to the decision makers and other stakeholders. This could increase the affordability of construction and housing.



# EU and Housing in the Nordics

The European Commission has appointed a commissioner responsible for housing. In its political guidelines for 2024–2029, the Commission has highlighted housing policy as a shared challenge to address collectively.

*The percentage of household income spent on housing has risen dramatically. Rents and house prices are soaring. There is also significant and growing investment gap in social and affordable housing.*

*To support Member States in addressing these issues, I will appoint a Commissioner whose responsibilities will include housing, and I will put forward a first-ever European Affordable Housing Plan.*

According to the Commission President, the plan will address structural drivers, include a strategy for housing construction, offer technical support to cities and Member States, and focus on investments. Together with the European Investment Bank (EIB), a European platform for investments in sustainable and affordable housing will be created to attract increased private and public investments.

In addition to this, a review of state aid rules has been announced, aimed at enabling housing support, particularly for energy-efficient and affordable housing and subsidized housing. For this purpose, the Cohesion Fund and the Social Climate Fund are also intended to be utilized. ►



## Housing as a National Concern

Housing policy has historically been considered a national concern. State aid rules and occasional joint EU initiatives have partially influenced the housing policy framework for Member States. However, the EU has primarily respected the differences between Member States and their ability to choose their own path. Opinions, however, have not been lacking. To varying degrees, Member States' housing policy choices and shortcomings have been highlighted in the European Commission's reform proposals during the so-called European Semester.

There are currently housing-related challenges recurring in housing markets across Europe. These can, to some extent, be described as shared challenges from a European perspective, prompting the initiatives announced by the new Commission. However, the fact that similar challenges and shortcomings exist in multiple countries is not sufficient reason to abandon the EU's subsidiarity-based approach to housing policy. The conditions for housing policy and the functioning of housing markets vary between countries. Solutions to housing market challenges should therefore primarily be designed and implemented at the national level.

## Respect the Unique Characteristics of National Markets

The Nordic countries have chosen different models to promote functional housing markets and ensure access to affordable housing for all citizens. A common feature in these markets is the presence of private actors who provide housing on a market basis and in free competition. A combination of national legislation and EU state aid rules ensures acceptable competition neutrality among various players in the housing markets. Maintaining this neutrality is crucial, particularly to enable necessary investments in new housing and the existing housing stock.

**It is essential that the EU continues to avoid policies or reforms that distort competition or undermine market-based rules that allow businesses and individuals to provide most of the rental housing in the Nordic countries. This includes respecting how rents and housing prices are determined in individual countries.**

In addressing homelessness and ensuring socially sustainable housing, the Nordic countries' respective models have had varying degrees of success. This is not cause for a common European approach. Instead, by encouraging the sharing of knowledge and best practices, the EU can help Member States design and implement measures tailored to their specific conditions to reduce homelessness and provide greater access to affordable homes.

Public authorities in member states can already subsidize housing and they do not need to notify such activity to the Commission, if it is restricted to "the provision of social housing for disadvantaged citizens or socially less advantaged groups, who due to solvency constraints are unable to obtain housing at market conditions" (Recital 11, SGEI Decision).

That restriction is fundamental. Clear delimitation of the scope of social or affordable housing as a SGEI allows the Commission to assess the respect of state aid rules. At the same time, it gives sufficient leeway to member states to define how and when subsidized housing responds to a public need. State aid must continue to be rigorously focused on the provision of affordable housing for those unable to access it at market conditions, no matter what the legal status of the provider is. This ensures that public funding granted for the provision of such services does not unduly distort competition on national and local housing markets. European rules on SGEI must continue to provide legal certainty to energize all European Internal Market actors to compete in increasing the supply, quality and affordability of the European housing stock.