

What Spain committed to the EU on social housing in its recovery plan, version by version (2021–2026)

EasyxLab · EasyByte Hub S. Coop. Mad. · Study S20

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Abstract

Under the Recovery and Resilience Facility (RRF), a Council Implementing Decision (CID) sets what a member state must deliver, as milestones and targets, to receive EU money. The Commission proposed 10 versions of Spain's CID between June 2021 and August 2026. Each amendment replaces the whole annex.

From every version we extracted the measures, milestones and targets on social and affordable housing: four housing measures and ten milestones and targets. We diffed the literal texts and classified each change. For each version we also traced:

- the reason stated in the recitals;
- the Council's adoption;
- the Commission's cost estimate;
- the item's status on the Commission's scoreboard.

The ICO loan line for social housing. It entered the plan in October 2023 at €4,000 million. The proposal of 17 December 2025 brought it to €750 million (–81.3%) and that of 7 August 2026 to €567,854,983 (–24.3%): –85.8% in all. Both times the stated reason was "lack of demand".

The dwelling target (target 31). It went from 20,000 to 17,365 (–13.2%) and then to 15,718 (–9.5%): –21.4% in all. Both times the stated reason was "inflation". Its wording changed in three steps:

- first: "New dwellings built", for which "construction shall be completed", attested by a certificate or proof of completion and use by the competent authority;
- then: "Provision of dwellings";
- then: "Construction or rehabilitation of dwellings".

The Commission's staff working documents give the programme an estimated cost of €1,000 million until September 2025, €1,920 million in December 2025 and €1,885 million in August 2026. No Commission text we read explains the change.

The December 2025 amendment rewrote the whole annex. In 109 of the 234 measure descriptions it kept, 46.6%, the text lost more than 30% of its words. The Government's summary speaks of «alrededor de 160 medidas» modified.

The housing measures were cut about as often as the rest of the annex. Two of the four housing measures (C2.I2 and C2.R7) lost more than 30% of their words. Target 31 lost more than most of the annex's milestones and targets.

In August 2026, housing items were among the few that lost text: the dwelling target and the ICO milestone are two of the 5 milestones and targets, out of 480, that lost more than 30%.

Between consecutive versions we count 19 item-level changes, 2 of them spacing only.

Adoption. The Commission's recitals give adoption dates for 9 of the 10 versions. For the last, the evidence is indirect:

- the Council's text prepared for adoption matches the proposal;
- the Spanish Government states that the Council adopted it on 27 August 2026;
- the Commission's scoreboard already shows its wording.

We found no EU record of the adoption itself.

What is new. The Spanish press reported the headline figures from 6 September 2026. The ECA reported a similar pattern elsewhere: an estimated cost that rises while the target falls. Our contribution is the complete literal record of every version, the reasons recital by recital, the adoption trail and a reusable differ.

1. Introduction

Spain's recovery plan has had a programme to build social rental housing since 2021, in component 2 (urban rehabilitation). Since the October 2023 amendment it also has a loan line, run by the Instituto de Crédito Oficial (ICO), for building and renovating social and affordable rental housing.

The commitments are written into the CID annex as measures, milestones and targets, and the Commission verifies each one before it pays an instalment.

The CID was amended nine times. Spain's Council of Ministers approved the last two amendments as an "Adenda de Simplificación", on 9 December 2025, and an "Adenda de Cierre", on 28 July 2026. Of the first, the Government's official summary of that day's Council of Ministers said: «Se han modificado alrededor de 160 medidas. Ejemplos de ello son la eliminación de: (i) lenguaje ambiguo o confuso, (ii) cualquier especificación innecesaria para demostrar el cumplimiento de las medidas de los planes de recuperación, (iii) hitos y objetivos intermedios». Of the second, the Government said that it «mejora la redacción de 121 hitos y objetivos y 101 medidas para dar mayor claridad al proceso evaluador y reducir cargas administrativas, aportando mayor seguridad jurídica, sin alterar los objetivos sustantivos de las reformas e inversiones».

We ask four questions:

1. What did Spain commit to the EU on social and affordable housing?
2. How did those commitments change, version by version, in amounts, targets and wording?
3. What reasons were stated?
4. Were the changes adopted?

We also give the dates of each change next to the EU's procedural deadlines, the payment calendar and the EU's Affordable Housing Plan. We report dates only and claim no intent.

2. Prior work

European Court of Auditors (ECA).

- *Special report 13/2024* (absorption of RRF funds) sampled four member states, Spain among them. In Spain it sampled 10 measures, 5 with amendments requested and 4 of those under Article 21. Across the sample, 64% of measures were affected by amendments, which «mainly concerned lowering targets, postponing the completion of measures or removing measures from the RRP». Its Spanish example is a residential-renovation target, C2.I1's target 27: «the intermediary target of renovating 231 000 residential dwellings by the end of 2023 was delayed due to lower-than-expected demand for renovation work caused by inflation». The report does not mention C2.I2 or C2.I7.
- *Special report 20/2026* (energy renovation of private homes) audited Belgium, Italy, Cyprus and Lithuania. Its Box 4 describes target revisions:
 - Cyprus: a private-home renovation measure (roof and wall insulation), 1,100 renovations down to 800.
 - Belgium: a Walloon social-housing measure, «the target number of social housing units to be equipped with PV panels was decreased from 3 600 to 1 532».
 - Lithuania: «The NRRP revision resulted in a 40 % reduction of the renovation measure's target, while the estimated RRF costs were increased by 32 %».

That last finding is the same pattern we report for C2.I2, from another member state. The report does not cover Spain.

- *Special report 26/2023* criticised the RRF's performance framework for measuring implementation rather than results.

Press. The headline figures are not new. Dates below are each article's own dateline. We found the articles through Bing News RSS; GDELT refused most queries with HTTP 429.

- **Okdiario, 9 August 2026.** It reports an access-to-information request to the Ministry of Housing and the December 2025 proposal's reason, «inflación». It gives no figures for target 31 or the ICO line.
- **El Confidencial, 6 September 2026.** This is the first report of the figures we found:
 - target 31 down to 15,718 «construidas o rehabilitadas», after 17,365;
 - the loss of the certificate of completion;
 - the ICO line down from €4,000 million to €568 million, for «falta de demanda»;
 - the Land Law amendment replaced by the update of SEPES's statute.

The article also cites AIReF's recovery-plan tracker: by 30 June 2026 the regions and municipalities «habían formalizado o concedido 1.301 millones, por encima de los 1.000 millones iniciales» for this programme. It states that «El Consejo de la UE ya ha dado el visto bueno al cambio».

- **talent24h.okdiario.com, 23 September 2026.** Two addenda in the BOE to the ICO line's domestic agreement, both effective 31 July 2026:

- the line from €4,000 million to €750 million;
- State guarantees from €2,000 million to €375 million.

We did not verify these in the BOE.

- **The Partido Popular analysis.** The PP presented it on Tuesday 29 September 2026: a cut of 85.8–86% to the ICO line and of 21% to the dwelling target. El Debate and Vozpópuli reported it on 30 September. We read those two articles.

We also saw headlines syndicated on MSN from elEconomista («El PP denuncia un recorte del 85,8% de los fondos europeos previstos para construir vivienda social») and from El Mundo (a 21% cut). We did not read those two articles and cite them only as headlines.

Scholarly literature. We ran 8 queries in English and Spanish on each of Crossref and OpenAlex, about 360 titles in all. They return work on the RRF's governance and conditionality, on the Portuguese plan's housing investments, and on public–private provision of affordable housing in Spain. None tracks Spain's housing milestones and targets version by version.

Others.

- The Commission publishes each version and the scoreboard, but no version-by-version record of the housing commitments.
- AIReF's site disallows our client in robots.txt.
- Bruegel's site returned HTTP 403.
- Searches of Fundación Alternativas and of the European Parliament's think tank returned nothing relevant.

What we claim as new is narrow:

1. the complete, literal and classified record of the housing commitments in all ten versions;
2. the stated reasons, recital by recital;
3. the adoption trail, including the Council's texts;
4. a reusable differ for CID annexes.

The figures themselves, and the direction of the cost estimate, were already public or have precedents.

3. Data and method

Full detail is in `METHOD.md`.

Versions. Cellar, the EU Publications Office repository, lists ten Commission proposals for Spain's CID, from COM(2021) 322 to COM(2026) 435. We read each one's English XHTML: the annex and the recitals. For nine of the ten versions the Council's own text prepared for adoption is also in Cellar, as a PDF; COM(2025) 794 is the exception.

Scope. A measure is in scope if its name, description, milestones or targets mention social or affordable housing, social or affordable rent, rental housing, public housing or the Housing Law. This rule was fixed before the diff was run. Four measures are housing measures:

MEASURE	TYPE	IN THE PLAN SINCE
C2.I2 Programme for the construction of social rental housing in energy-efficient buildings	grants	2021
C2.I7 ICO Loan Facility for the Promotion of Social Housing	loans	October 2023
C2.R3 Housing Law	reform	2021
C2.R7 Programme of measures to promote the supply of rental housing; renamed "Accessibility of housing" in December 2025	loans	October 2023

We also track:

- the Regional Resilience Fund (C13.I13), which lists social and affordable housing among seven priority areas, reported as context;
- the component-2 summary sentence that restates the number of dwellings, as its own item.

Diff. A word-level differ classifies each change between consecutive versions. An item can carry several categories:

- **amount:** a euro amount changed;
- **quantity:** the goal, or another number in the text, changed;
- **deadline:** the due quarter or a date changed;
- **definition:** the words changed once numbers are removed;
- **editorial:** any other textual change, spacing included;
- **added** or **removed**.

Every textual change is recorded, including spacing. The rules are mechanical and tested (12 tests), and each change is published with both literal texts (`data/diffs.csv`).

Base rate. To set the housing items against the whole annex, we counted the words of every measure description and every milestone/target description present in both versions of each of the last two amendments (`data/baseline_*.csv`).

Adoption, costs, status.

- Adoption dates come from the Commission's own recitals. Recital 1 of COM(2026) 435 lists every earlier decision, and the dates agree across successive proposals.
- The Council's texts are compared field by field with the Commission's.
- Cost estimates come from the climate-tracking tables of the Commission staff working documents (SWD) that accompany the proposals.
- Statuses come from the Commission's Recovery and Resilience Scoreboard, through the public application that the scoreboard page itself uses.

4. Results

4.1 What Spain committed to in 2021 and 2023

C2.I2 in the 2021 decision. Its description:

«The objective of this measure is to build at least 20 000 new dwellings for social rental purposes or at affordable prices compliant with energy efficient criteria. These shall be built in particular in areas in which social housing is currently insufficient and on publicly owned land. The primary energy demand of the social housing shall be at least 20 % below the requirements of nearly zero-energy buildings.»

Target 31, due in Q2 2026:

«At least 20 000 dwellings built for social rental or at affordable prices compliant with energy efficient criteria. This figure corresponds to the number of dwellings for which construction shall be completed and shall address social rental at affordable prices, as attested by a certificate or proof of completion and use of the dwellings by the competent authority.»

Two milestones came with it:

- **Milestone 30**, due Q3 2021: a Royal Decree setting the programme's energy requirements.
- **Milestone 22**, due Q3 2022: the entry into force of the Housing Law (C2.R3).

The Commission's staff working document put the programme's cost at €1,000 million.

The October 2023 amendment added loan-funded measures.

C2.I7 is a public investment in an ICO facility for the «construction and renovation of energy efficient social and affordable housing», which «aims at initially providing at least EUR 4 000 000 000 of financing». Its buildings had to be «used for social or affordable rent, or transferred in use for social and affordable rent for a minimum period of 50 years». Its milestones and targets:

ITEM	DUE	WHAT IT REQUIRED
L4	Q4 2023	the implementing agreement
L5	Q2 2025	loan agreements for at least 40% of the funds
L6	Q3 2026	loan agreements for 100% of the funds, at least 53% for climate objectives
L7	Q3 2026	«Spain shall transfer EUR 4 000 000 000 to the ICO Facility»

The Spanish Government had presented the line on 9 May 2023 as «una línea de préstamos de 4.000 M€ para promover hasta 43.000 viviendas en alquiler asequible».

The same amendment added C2.R7. Its milestone L2 was an amendment of the Land and Urban Rehabilitation Law «aimed at speeding up the urban planning procedures associated with building rehabilitation actions and construction of buildings for the purpose of social housing».

4.2 The version table

The October 2023 amendment added two housing measures, C2.I7 and C2.R7, with their milestones. Leaving those additions aside, four of the nine amendments changed an existing housing item.

Between consecutive versions we count 19 item-level changes to the core housing items, 2 of them spacing only. Of the 19:

- 13 changed the definition;
- 7 changed a quantity;
- 6 changed an amount;
- 5 changed a deadline;
- 3 removed an item;
- 2 were editorial.

A change can fall into several categories. New items are not counted: the 2023 additions, and milestone L2a, added in December 2025.

AMENDMENT (PROPOSAL)	ITEMS CHANGED	CATEGORIES
COM(2024) 592, 18 December 2024	C2.I2 and C2.I7 descriptions (each now refers to the other measure as complementary support); target 31	definition; amount (target 31 gains «At least EUR 950 000 000 of grants awarded»)
COM(2025) 271, 26 May 2025	C2.I7 description	editorial: «1.Description» became «1. Description»
COM(2025) 794, 17 December 2025	C2.I2, C2.I7 and C2.R7 descriptions; target 31; L6 merged with L7; L3; L5, L7 and L2 removed (L2a added)	definition, quantity, amount, deadline
COM(2026) 435, 7 August 2026	C2.I2 and C2.I7 descriptions; target 31; L6; component summary; milestone 30	definition, quantity, amount; milestone 30 editorial («80 %» became «80%»)

The Housing Law milestone (22) never changed. The Royal Decree milestone (30) changed only by that one space. Both were fulfilled and paid:

- milestone 22 in grant instalment 4, disbursed 26 July 2024;
- milestone 30 in grant instalment 2, disbursed 29 July 2022.

4.3 The December 2025 amendment in context

COM(2025) 794 rewrote the whole annex. The Government's summary of 9 December 2025 speaks of about 160 measures modified, with ambiguous language, unnecessary specifications and intermediate milestones removed (§1).

Measure descriptions. Of the 234 measures whose descriptions appear in both COM(2025) 556 and COM(2025) 794:

- 136 changed;
- 109 (46.6%) lost more than 30% of their words;
- the median description kept 86.8% of its words.

The housing measures, against that base rate:

MEASURE	WORDS KEPT
C2.R7	44.8%
C2.I2	51.9%
C2.I7	98.6%
C2.R3	100% (unchanged)

Two of four lost more than 30%, about the rate of the annex as a whole.

Milestones and targets. Of the 460 present in both versions, 79 (17.2%) lost more than 30% of their words. Target 31 kept 30.3%, the 31st largest cut of 460. Milestone L3 kept 53.3%. Of the annex's 600 milestones and targets, 140 were removed; of the 9 core housing ones, 3 were removed (L5, L7 and L2).

C2.I2's description lost this sentence:

«These shall be built in particular in areas in which social housing is currently insufficient and on publicly owned land.»

It also lost the energy requirement («at least 20 % below the requirements of nearly zero-energy buildings»). Those deletions belong to this annex-wide rewrite. The energy requirement survives in milestone 30 and in the component summary.

August 2026 was different. COM(2026) 435 changed far less:

- of the 237 measure descriptions present in both versions, 43 changed and 2 lost more than 30% of their words;
- of the 480 milestones and targets present in both, 95 changed and 5 lost more than 30%.

Target 31 (kept 56.8%) and L6 (kept 68.7%) are two of those five. C2.I2 (85.5%) and C2.I7 (88.7%) are the 8th and 11th largest cuts among the 237 measure descriptions.

4.4 Target 31: from "new dwellings built" to "construction or rehabilitation"

VERSIONS	NAME	GOAL	LITERAL DESCRIPTION (BEGINNING)
2021 to September 2025	New dwellings built for social rental or at affordable prices	20,000	«At least 20 000 dwellings built ...», whose «construction shall be completed»; from December 2024, «At least EUR 950

VERSIONS	NAME	GOAL	LITERAL DESCRIPTION (BEGINNING)
	compliant with energy efficient criteria		000 000 of grants awarded leading to the completion of at least 20 000 dwellings ...»
December 2025, May 2026	Provision of dwellings	17,365	«Provision of a total of 17 365 dwellings under the Programme to support the construction of social rental housing in energy-efficient buildings (Programa de ayuda a la construcción de viviendas en alquiler social en edificios energéticamente eficientes).»
August 2026	Construction or rehabilitation of dwellings	15,718	«Construction or rehabilitation of a total of 15 718 dwellings under programmes to support social rental housing in energy efficient buildings.»

The December 2025 text dropped four elements:

- the completion requirement;
- the certificate or proof of completion and use;
- the energy performance certificate;
- the euro amount of grants.

The August 2026 text does not restore any of them. It adds rehabilitation alongside construction, refers to "programmes" in the plural, and states no completion requirement.

The measure description changed in step:

- **December 2025:** «The objective of this measure is to support energy-efficient social rental dwellings. The measure consists in providing dwellings under the Programme...».
- **August 2026:** «The measure consists in the construction or rehabilitation of dwellings under programmes to support social rental housing in energy efficient buildings».

The component-2 summary kept «construct at least 20 000 new dwellings» in the December 2025 and May 2026 versions. In August 2026 it reads «construct at least 15 718 new dwellings», while target 31 itself reads «Construction or rehabilitation».

4.5 The ICO line: €4,000 million, €750 million, €567,854,983

VERSIONS	THE FACILITY «AIMS AT INITIALLY PROVIDING»	TRANSFER MILESTONE	CLIMATE REQUIREMENT	LOAN AGREEMENTS
October	«at least EUR 4	L7, Q3 2026:	«at least EUR 2	L5: 40% by Q2

VERSIONS	THE FACILITY «AIMS AT INITIALLY PROVIDING»	TRANSFER MILESTONE	CLIMATE REQUIREMENT	LOAN AGREEMENTS
2023 to September 2025	000 000 000»	«Spain shall transfer EUR 4 000 000 000»	122 000 000»; L6: «At least 53%»	2025; L6: 100% by Q3 2026
December 2025, May 2026	«at least EUR 750 000 000»	merged into L6, now a milestone due Q2 2026: «Spain shall transfer EUR 750 000 000»	«at least EUR 397 500 000»; «At least 53%» kept	L5 removed; L6: 100% by Q2 2026
August 2026	«at least EUR 567 854 983»	L6, Q2 2026: «Spain shall transfer EUR 567 854 983»	removed	L6: 100% by Q2 2026

The August 2026 version also removed three things:

- «energy efficient» from the measure's objective;
- the energy conditions of the direct loans («at least a 20% lower primary energy consumption», «a reduction of at least 30%»);
- the reference to the rent criteria of «Programme 6 of Royal Decree 853/2021».

The 50-year social or affordable rental use stays. The component summary's item e) still speaks of «energy efficient social and affordable housing».

The Commission's climate-tracking table lists C2.I7 at €588 million plus €163 million in December 2025. Its August 2026 table no longer lists C2.I7.

Domestic side. As reported in the press (§2), the ICO line's domestic agreement was cut to €750 million with effect from 31 July 2026.

The Government's account of the last payment request, on 1 October 2026, states that «se ha formalizado la línea ICO de promoción de vivienda social, dotada con 568 millones de euros para 4.675 viviendas». On 10 September 2026 a Government news item on an ICO loan in Toledo described the loan as part of «la Línea ICO Vivienda, dotada con 4.000 millones de euros».

4.6 C2.R7: from a Land Law amendment to the statute of SEPES

In December 2025, C2.R7 was renamed from «Programme of measures to promote the supply of rental housing» to «Accessibility of housing». Its milestones changed as follows:

- **L2, removed.** An amendment of the Land and Urban Rehabilitation Law, due Q2 2025, to speed up planning procedures «for the purpose of social housing».

- **L2a, added.** «A legal act shall have entered into force to update the Statute of the Entidad Pública Empresarial de Suelo (SEPES)», due Q4 2025.
- **L3, moved.** The best-practice guide on planning licences moved from Q2 2025 to Q4 2025 and gained the guide's Spanish title. It also lost its content requirements: «(i) the exchange of knowledge and experience between administrations at local, regional and central level, (ii) measures to systematise and optimise processes and (iii) the future development of pilot projects in different territorial contexts».

The scoreboard records L2a and L3 as fulfilled, paid in loan instalment 3 on 11 August 2026. The Council's recommendation of 8 July 2025 had asked Spain to «Increase the housing supply by completing the reform of the land law».

4.7 The stated reasons

The reasons are stated in the recitals of each proposal and repeated in the Council's text.

COM(2024) 592, recital 6. C2.I2's target 31 and the descriptions of C2.I2 and C2.I7 are among the «24 measures [that] have been amended to implement better alternatives in order to achieve the original ambition of the measure».

COM(2025) 794.

- Recital 4: «Spain has explained that 35 measures are partially no longer achievable, because of lack of demand. This concerns C2.I7 (ICO Loan Facility for the Promotion of Social Housing), ...».
- Recital 6: «three measures are partially no longer achievable because of inflation. This concerns C2.I2 ...».
- Recital 9 covers C2.R7: «Spain has explained that 72 measures have been amended to implement better alternatives that allow the administrative burden to be reduced and simplify the Council Implementing Decision, while still achieving the objectives of those measures».

COM(2026) 435.

- Recital 4: «Spain has explained that one measure is partially no longer achievable because of inflation. This concerns measure C2.I2 ...».
- Recital 5: «11 measures have been amended due to lack of demand. This concerns measures C2.I7 ...».
- Recital 10 lists both C2.I2 and C2.I7 among the measures whose level of implementation decreased.

4.8 What the programme was expected to cost

The Commission's staff working documents give an «Estimated costs (EUR m)» for each measure:

VERSION	C2.I2 ESTIMATED COST	TARGET 31	COST PER TARGET DWELLING (OUR DIVISION)
2021 (SWD(2021) 147)	€1,000 million	20,000	€50,000
September 2025 (SWD(2025) 276)	€1,000 million	20,000	€50,000
December 2025 (SWD(2025) 432)	€1,920 million	17,365	€110,567
August 2026 (SWD(2026) 267)	€1,885 million	15,718	€119,926

The only reason the Commission's texts give for amending C2.I2 is inflation: recital 6 of COM(2025) 794 and recital 4 of COM(2026) 435. No Commission text we read explains the change in the estimated cost. The division in the last column is ours; the texts state no cost per dwelling.

The direction is not unique:

- El Confidencial, citing AIReF's tracker, reported €1,301 million formalised or granted by June 2026 against €1,000 million initially (§2);
- the ECA reported a 40% lower target with a 32% higher estimated cost for a Lithuanian renovation measure.

4.9 Adoption

VERSION	PROPOSAL	COUNCIL TEXT PREPARED FOR ADOPTION	ADOPTED	SOURCE OF THE DATE
original	16 June 2021	ST 10150/21	13 July 2021	COM(2026) 435, recital 1
2023	2 October 2023	ST 13695/23 REV 1	17 October 2023	idem
2024a	22 April 2024	ST 9303/24	14 May 2024	idem
2024b	18 December 2024	ST 17099/24	21 January 2025	idem
2025a	11 April 2025	ST 8053/25	13 May 2025	idem

VERSION	PROPOSAL	COUNCIL TEXT PREPARED FOR ADOPTION	ADOPTED	SOURCE OF THE DATE
2025b	26 May 2025	ST 9583/25	12 June 2025	idem
2025c	19 September 2025	ST 13075/25	10 October 2025	idem
2025d	17 December 2025	none in Cellar	20 January 2026	idem; the Spanish Government cites a «Decisión de Ejecución del Consejo de 13 de enero de 2026»
2026a	20 May 2026	ST 9518/26 ADD 1	12 June 2026	idem
2026b	7 August 2026	ST 12355/26, 25 August 2026, «of ...»	27 August 2026, reported	Spanish Government, 1 October 2026

Council texts match. Where a Council text exists, its housing items are those of the Commission's proposal: 206 of 206 field comparisons match, across nine versions.

The comparison can detect a difference. In the Regional Resilience Fund, outside our core scope, the 2023 proposal's milestone L54 says «at least 25%» in its text but 15% in its goal cell; the Council's text says 15%.

The last version. The Spanish Government's statement of 1 October 2026 reads: «El 27 de agosto el Consejo adoptó la adenda técnica de cierre, que aclara la redacción de los hitos pendientes y la evidencia que debe aportarse para el último desembolso».

We could not confirm it from an EU source:

- the Council's website is closed to our client;
- Cellar records no Council adoption event for any version of Spain's CID;
- no later Commission text exists yet to list it;
- the Commission's Spain page lists no adopted decision for August 2026, but it lists none for January 2026 either, so its silence says nothing.

There is indirect evidence. On the Commission's scoreboard, refreshed on 04/10/2026:

- target 31 reads «Construction or rehabilitation of a total of 15 718 dwellings ...», goal 15718;
- milestone L6 reads «Spain shall transfer EUR 567 854 983 to the ICO Facility».

Both match only the August 2026 version. Both are «Not Assessed»: target 31 in grant instalment 7, L6 in loan instalment 4.

4.10 Dates

DATE	EVENT
4 June 2025	Commission, COM(2025) 310: «the Commission urges Member States to undertake such plan revisions as soon as possible and, in any event, by the end of 2025»
8 July 2025	Council recommendation to Spain: «Strengthen the provision of social and affordable housing»
29 November 2025	Spain's reasoned request behind COM(2025) 794 (recital 2)
9 December 2025	Spain's Council of Ministers approves the «Adenda de Simplificación»
16 December 2025	Commission, European Affordable Housing Plan, COM(2025) 1025
17 December 2025	Commission proposal COM(2025) 794: ICO line to €750 million, target 31 to 17,365
20 January 2026	Council adoption (Commission's recitals)
30 June 2026	end of Q2 2026, the due date of target 31 and of L6
10 July 2026	Council recommendation to Spain: «Increase the provision of affordable and social housing, favouring rental options ...»
11 July 2026	Spain's reasoned request behind COM(2026) 435 (recital 2)
28 July 2026	Spain's Council of Ministers approves the «Adenda de Cierre»
7 August 2026	Commission proposal COM(2026) 435: ICO line to €567,854,983, target 31 to 15,718
25 August 2026	Council text ST 12355/26 prepared for adoption
27 August 2026	adoption, according to the Spanish Government

DATE	EVENT
31 August 2026	deadline for all milestones and targets (Regulation (EU) 2021/241, Article 18(4) (i)); «there is no scope for adopting amendments of RRP after 31 August 2026» (COM(2025) 310)
1 October 2026	Spain announces its seventh and last payment request (148 milestones and targets)
31 December 2026	deadline for the Commission's payments (Regulation (EU) 2021/241, Article 24(1))

In both rounds, Spain's reasoned request came before its Council of Ministers' approval: 29 November then 9 December 2025, and 11 July then 28 July 2026.

The table orders the events in time. It does not tell why any change was made, and we draw no inference from the order.

4.11 The European Semester

The Council's recommendations to Spain contained:

- **2019, 2020, 2021, 2024:** no operative recommendation on housing.
- **2022 and 2023:** «Increase the availability of energy-efficient social and affordable housing, including through renovation».
- **2025:** «Strengthen the provision of social and affordable housing».
- **2026:** «Increase the provision of affordable and social housing, favouring rental options, better aligned with territorial and regional needs and based on sustainable financing systems that are less dependent on government financing».

The 2026 recommendation's recital 34 states that «Spain has one of the lowest stocks of social housing across the EU, representing less than 2 % of the total housing supply compared to an EU average of roughly 7 %».

Separately, on 21 January 2025 the Council endorsed Spain's medium-term fiscal-structural plan. Among Spain's commitments it lists «Increase the supply of affordable housing Step 1: By Q4 2025, launch of tenders to provide public land to private promoters for the construction of affordable housing units».

4.12 Other member states in the same round

Ten other member states' plans were amended in the same August 2026 round (Council texts of 20–25 August). In five of them a recital names a housing measure:

MEMBER STATE	HOUSING MEASURE NAMED	STATED REASON
Greece	«Affordable Housing Programme 'My Home II'», «Social and Affordable Housing»	better alternatives
Portugal	«Affordable and Social Housing», «Support Programme for Access to Housing», two Azores housing measures	better alternatives
Belgium	«Development of social housing and housing for vulnerable persons»	«unforeseen technical difficulties»
Poland	«Investment in housing projects»	«difficult winter weather conditions, unexpected contract cancellations, project delays and lack of demand» (six measures)
Italy	«Financial instrument for energy renovations of public residential housing», «Housing First and Post Stations», «Innovation Programme for Housing Quality», «Student Housing»	better alternatives; decrease in allocation

We read only these recitals and did not diff these states' annexes. This is a pointer, not a comparison of how much each commitment changed.

5. Discussion

The record shows three kinds of change, and they should be kept apart.

Amounts and quantities fell, for reasons the texts state. Lack of demand for the ICO line; inflation for the dwelling programme.

Definitions changed in the same amendments. What counts towards target 31 went in three steps:

- first, a dwelling whose construction was completed, attested by a certificate or proof of completion and use;
- then, a dwelling «provided»;
- then, a dwelling counted under «construction or rehabilitation», with no completion requirement stated.

Much of the December 2025 deletion of descriptive detail, the location criteria included, was part of an annex-wide rewrite. The housing measures were cut there at about the annex's rate. Target 31's description was cut more than most. In August 2026, by contrast, few items lost text, and the dwelling target and the ICO milestone were among them.

One reform changed object. C2.R7 went from a Land Law amendment to the statute of the public land agency.

The texts give no reason for individual wording changes beyond the headings quoted in §4.7. The recitals group measures by reason; they do not explain individual wording.

What the record cannot settle. Whether Spain met target 31 as last worded is for the Commission to decide when it assesses the last payment request. The Government states that «Se ha iniciado la construcción de 23.000 viviendas destinadas al alquiler social, de las que 16.000 ya están finalizadas». The Commission's assessment will show how it applies the new wording.

6. Limitations

- **Our main source is the proposals, not the adopted texts.** For nine versions we checked them against the Council's texts prepared for adoption and found them identical on every housing item. For COM(2025) 794 there is no Council text in Cellar.
 - **We did not confirm the adoption of COM(2026) 435 from an EU source** (§4.9). If the Council adopted different figures, which the scoreboard does not suggest, the August 2026 row would change.
 - **Scope.** The keyword rule may miss housing content written in other words. Measures that fund housing among other things are treated as context or are out of scope: the Regional Resilience Fund, and the ICO equity injections behind the «España Crece» fund. The Government presents España Crece as mainly for housing; its CID text no longer mentions housing.
 - **The change categories are mechanical.** "Definition" covers small rewordings as well as substantive ones. The base rate counts words, not meaning. Read the literal texts in `data/diffs.csv`.
 - **The costs are estimates.** They are the Commission's estimates in staff working documents, not spending. The cost per target dwelling is our division.
 - **Scoreboard statuses** are as of the refresh of 4 October 2026 and will change.
 - **The press search used one engine.** Bing News RSS was the only one that worked (§2). Older or paywalled coverage may be missing.
-

7. Ethics

How we fetched.

- Every scripted request carried our User-Agent, read robots.txt first and kept to at most one request per second per host.
- Where robots.txt disallowed our client (the Council's website, AIReF, Google News), we did not fetch with scripts.
- One manual check of the Council's press-release listing, made with a browser-like client after we had read the disallow, returned HTTP 403. We did not try again or try to get round it.
- The scoreboard was queried through its public, anonymous application, the same way the Commission's own page does it. No login or key was used.

Personal data. We used only official texts and published news. We processed no personal data. Officials and politicians appear only as named in the quoted public documents and press.

Contacts. We contacted no one.

8. Data, code and licences

The code (Apache-2.0) and the data (CC BY 4.0) are in this folder; see `README.md` for the layout and how to run.

The EU texts are © European Union, reused under Decision 2011/833/EU and the Council's notice on reproduction. Third-party files are not redistributed: `data/` holds the literal passages we quote and our derived tables.

9. Automation and review

AI agents (Claude models) did the work. They:

- found and downloaded the sources, under the rules in §7 and `METHOD.md` ;
- wrote and tested the parser and the differ;
- extracted and diffed the texts;
- queried the scoreboard;
- searched for prior work;
- drafted the text.

A first agent was stopped by accident after building the version inventory and downloading the proposals. A second agent reused that work and completed the study.

Checks.

- `scripts/check_headlines.py` checks every number in the README and in this paper's headline sentences against `data/` .
- `scripts/check_quotes.py` checks that every quotation occurs in a downloaded source text.

Independent review. An independent AI agent then reviewed the study adversarially:

- it re-extracted the figures from its own downloads of the texts;
- it re-checked the dates and the prior work;
- it re-ran the pipeline, which reproduced `data/` byte for byte.

Its findings were one blocker (a press date taken from a news feed rather than the article) and three major ones:

- the base rate of the December 2025 rewrite;
- the framing of the timing section;
- a missing ECA precedent.

There were also minor ones. All were applied: the press dates are now the articles' own datelines, §4.3 gives the base rate, §4.10 is a plain table, and §2 cites the ECA findings and narrows the novelty. The reviewer has not yet re-read this version.

10. Competing interests

EasyByte Hub S. Coop. Mad., which runs EasyxLab, has no contract with the Spanish Government, the ICO, the Commission or any recipient of these funds. It has not applied for RRF funding for housing. The differ published here could become part of a tool; no such EasyByte product exists today.

How to cite

EasyxLab (2026). What Spain committed to the EU on social housing in its recovery plan, version by version (2021–2026). Study S20. EasyByte Hub S. Coop. Mad. <https://github.com/easybythub/easyxlab>

References

- Commission proposals for a Council Implementing Decision on Spain's recovery and resilience plan: COM(2021) 322, COM(2023) 576, COM(2024) 185, COM(2024) 592, COM(2025) 177, COM(2025) 271, COM(2025) 556, COM(2025) 794, COM(2026) 257, COM(2026) 435. CELEX numbers are in `scripts/s20lib.py`.
- Council documents ST 10150/21, ST 13695/23, ST 9303/24, ST 17099/24, ST 8053/25, ST 9583/25, ST 13075/25, ST 9518/26, ST 12355/26.
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- Press (datelines from the articles): Okdiario, 9 August 2026; El Confidencial, 6 September 2026; talent24h.okdiario.com, 23 September 2026; El Debate and Vozpópuli, 30 September 2026. URLs are in `data/prior_work_search.csv`.

Cite this study

CITATION

EasyxLab (2026). What Spain committed to the EU on social housing in its recovery plan, version by version (2021-2026). Study S20. EasyByte Hub S. Coop. Mad. <https://github.com/easybytehub/easyxlab/tree/main/studies/s20-recovery-plan-housing-commitments>

BIBTEX

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