

# EU-ASE RESPONSE TO THE PUBLIC CONSULTATION ON THE REVISION OF THE ENERGY PERFORMANCE OF BUILDINGS DIRECTIVE (EPBD)



E3G



ORBITAL SYSTEMS



EUROPEAN ALLIANCE TO  
**SAVE ENERGY**

*Creating an Energy-Efficient Europe*

# Consultation on the revision of the Energy Performance of Buildings Directive 2010/31/EU

Fields marked with \* are mandatory.

## Introduction

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As announced in the [European Green Deal](#), the Commission adopted on 14 October 2020 a strategic Communication "[Renovation Wave for Europe - greening our buildings, creating jobs, improving lives](#)". It contains an action plan with specific regulatory, financing and enabling measures for the years to come and pursues the aim to at least double the annual energy renovation rate of buildings by 2030 and to foster deep renovations. It is expected that mobilising forces at all levels towards these goals will result in 35 million building units renovated by 2030.

The [Renovation Wave](#) confirms that the existing legislative measures on buildings will neither suffice to achieve the increased EU 2030 climate target of at least 55% emission reduction target and the planned increase in the ambition for energy efficiency, nor the 2050 climate neutrality objective. Therefore, the Renovation Wave communication announces a revision of the Energy Performance of Buildings Directive 2010/31/EU (EPBD) together with a number of areas of legislative and non-legislative reinforcement in relation to building renovation and decarbonisation of buildings. The EPBD is the cornerstone of European legislation in the area of energy performance of buildings. It aims at accelerating the transformation of the EU building stock into a highly energy efficient and decarbonised building stock by 2050.

The Renovation Wave already indicated some specific aspects which will be addressed in the revision of the EPBD, namely: the phased introduction of mandatory minimum energy performance standards for all types of buildings (public and private), an update of the framework for Energy Performance Certificates, the introduction of Building Renovation Passports and the introduction of a 'deep renovation' standard in the context of financing and building decarbonisation objectives. The requirements for new buildings and measures fostering sustainable mobility are also considered to be updated in line with the enhanced climate ambition of the European Green Deal and the Climate Target Plan 2030. This includes addressing resource efficiency and circularity principles in order to reduce whole lifecycle emissions, digitalisation in design, construction and operation of buildings, climate resilience and health and environmental requirements, as well as accessibility for persons with disabilities, and energy poverty, requires consideration. More information is provided in the [Inception Impact Assessment](#).

This questionnaire is part of a larger stakeholder consultation which will feed into the Commission's work on the revision of the EPBD. It builds upon the results from the very extensive and in-depth public consultation for the Renovation Wave that took place between January and September 2020, whose results have been assessed in a [dedicated report](#).

## About you

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\* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation

- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

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\* Surname

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\* Organisation name

*255 character(s) maximum*

European Alliance to Save Energy (EU-ASE)

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

37816636575-51

\* Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Djibouti
- Libya
- Saint Martin
- Åland Islands
- Dominica
- Liechtenstein
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname

- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine

- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
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- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

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## Part A. Planning and policy instruments

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### Decarbonisation of buildings

**Question 1.** The [long-term decarbonisation strategy](#) has introduced the concept of zero emission buildings by 2050, in view of achieving carbon neutrality in the long term. Do you agree that such a novel concept should be defined in the EPBD?

- Yes
- No, it is not needed in the EPBD
- No opinion

If yes,

- It should include greenhouse gas emissions covering the whole life-cycle of buildings
- It should include minimum renewable energy share in buildings and city neighbourhoods
- It should refer to a timeline to gradually phase out fossil fuels, in particular for heating and cooling systems

Other - please specify in comment box

\* Please specify:

*500 character(s) maximum*

ZEBs must build upon the EE1 principle. The EPBD is the driver to reduce the energy needs of buildings and optimise their energy consumption thus accelerating the integration of RES. ZEBs should refer to buildings with ultra-efficient energy performance (calculated through primary and final energy consumption) where the nearly zero energy need required is supplied with 100% RES. ZEBs should also aim to whole-life cycle GHG emissions reductions to foster resource and material efficiency.

**Question 2.** Long-Term Renovation Strategies (LTRS) set the vision, roadmap, concrete policy measures and actions, and dedicated financing mechanisms to decarbonise national building stocks by 2050. The [first 13 LTRS](#) submitted have been assessed by the Commission. Under the existing legal framework the LTRS are due every 10 years, with a possibility for updates as foreseen under the Governance Regulation.

Should the EPBD provisions on the Long Term Renovation Strategies be modified?

- Yes  
 No

\* If yes, how?

*1000 character(s) maximum*

LTRS should be designed to fully support the decarbonisation of the building stock, based on a more detailed mapping of potentials and corresponding financing schemes & support tools. The number of buildings to be renovated in each segment should be mapped together with estimated savings. Progress in the EPBD should be benchmarked against a 2030 energy efficiency milestone/target for the building sector, which should be monitored in the EED.

LTRS should enshrine mandatory milestones to renovate the building stock based on the introduction of Minimum Energy Performance Standards

LTRS should be integrated with the requirement in Article 14 of the Energy Efficiency Directive, which obliges all Member States to perform a comprehensive assessment of their potential for the application of high-efficiency cogeneration and efficient district heating and cooling. The definition used in Article 14 should be updated to reflect the 2050 objective of a carbon neutral economy.

**Question 3.** Should the monitoring of the objectives identified by MSs in their LTRS be strengthened?

- Yes  
 No

If yes,

Through a specific monitoring tool to be developed by the Commission

- By requiring a 5-year revision of the LTRS
- By developing a common template and requesting specific data and indicators, in order to make the information provided by Member States more comparable
- By requesting more data, especially on greenhouse gas emission effects, to allow assessing the contributions to the EU climate policy targets
- By linking the LTRS to other policies (heating and cooling, renewables, products, etc.)
- Other - please specify in comment box
- No opinion

\* Please specify:

*500 character(s) maximum*

LTRS should improve traceability and monitoring of how many buildings in each segment are renovated. They should: Foresee & help deployment of renovation coordinator roles and training schemes; Indicate the planned evolution of rate of deep renovations carried on annual basis, together with outline of policies for boosting it; Foresee a platform of stakeholders involving civil society to monitor progress; Be supported by housing, climate, health & education ministers; Alignment with art14 of EED

**Question 4.** Which measures would you add in the EPBD to further support district and city authorities to increase energy efficiency in buildings and to accelerate the rate of replacement of boilers by carbon free ones based on renewable energy?

*1000 character(s) maximum*

City authorities can implement several measures to accelerate rate of deep and comprehensive renovations and replacement of boilers by more efficient, carbon free options. A key element is the full operationalization of the EE1 principle. Streamlining energy efficiency and increased digitalization -combined with MEPS, appropriate financing support and a neighborhood approach to renovation- create the conditions for diminishing energy demand and optimising consumption. Better performing, highly efficient buildings are a prerogative for faster and deeper integration of RES, the uptake of carbon free technologies like heat pumps & the development of highly efficient district energy systems. Technical Assistance is essential to implement efficiency projects. The EPBD should include provisions to require allocations for TA across renovation programs. This is necessary to help understand technological options available, plan & manage comprehensive renovation and facilitate access to finance.

### **Resource efficiency and climate resilience in buildings renovation**

The European Green Deal points to energy and resource efficiency. Following this, the new [Circular Economy Action Plan \(CEAP\)](#) adopted in March 2020 acknowledges that reaching climate neutrality by 2050 requires highly energy and resource efficient buildings equipped with renewable energy, considering life cycle performance and a more efficient use of resources for building renovation and construction. The Renovation Wave equally sets our actions in this regard, such as the development of a 2050 whole life cycle performance roadmap to reduce carbon emissions from buildings.

**Question 5.** Do you think a revised EPBD should include measures to report on whole life-cycle carbon emissions from buildings (manufacturing and construction, use and end of life)?

- Yes
- No, the EPBD is not the right tool for this
- I don't know/ No opinion

If yes,

- For all buildings (new buildings and renovations)
- For all new buildings
- For renovations only
- For all new public buildings
- For renovations of public buildings only
- For a subset of private non-residential buildings such as shopping centres or datacenters
- The opportunity should be considered in the context of the revision evaluation mandated for 2026

Comment:

*500 character(s) maximum*

The EPBD should contribute towards 2050 whole-life carbon zero-emissions buildings roadmap, by starting to report on whole life cycle GHG emissions for new buildings and major renovation projects. Reporting should be based on EU common methodologies and standards (i.e. EU Commission Level(s) initiative). Carbon metrics are a necessary tool to help decarbonise the buildings sector, as long as they complement energy metrics, which are the main tool to improve the energy performance of a building.

**Question 6.** Should the EPBD require that the likely impacts of climate change are taken into account in the planning of new buildings and major renovations?

- Yes
- No, the EPBD is not the right tool for this
- No opinion

If yes,

- For new private buildings (residential and non-residential)
- For new public buildings
- For private renovations
- For renovations of public buildings

- In the case of private buildings, only if they are above a certain size
- In case of private buildings, only for a subset of non-residential buildings such as offices or commercial buildings
- The opportunity should be considered in the context of the revision evaluation mandated for 2026

**Question 7.** As announced in the Renovation Wave, the Commission will develop a 2050 whole life-cycle performance roadmap<sup>1</sup> to reduce carbon emissions from buildings and advancing national benchmarking with Member States. How do you think the EPBD could contribute to this roadmap?

*1000 character(s) maximum*

The goal of the EPBD is the decarbonization of the building stock by 2050. In this long-term perspective, it is necessary to reduce both operational and embodied carbon. The role that the EPBD could play in support of a Commission 2050 whole life-cycle performance roadmap is to introduce provisions for all new buildings and major renovations. It should start with reporting on operational and embodied carbon separately to complement the much needed focus on operational energy reduction to tackle all life-cycle emissions by 2050. The EPBD should do this by introducing a common European framework to help design and construct sustainable buildings with the whole lifecycle in mind, using the LEVEL(S) tool in that regard.

<sup>1</sup>The Roadmap is one of the actions foreseen in the Renovation Wave Communication (COM(2020) 662 final) to make the construction ecosystem fit to deliver sustainable renovation.

#### **Nearly zero-energy buildings (NZEB)**

**Question 8.** The EPBD requires all new buildings from 2021 (public buildings from 2019) to be nearly zero-energy buildings (NZEB). According to [Article 2](#) "nearly zero-energy building" means a building that has a very high energy performance, as determined in accordance with Annex I. The nearly zero or very low amount of energy required should be covered to a very significant extent from renewable sources, including sources produced on-site or nearby. Do you think that the current definitions for NZEBs are ambitious enough to contribute towards a fully decarbonised building stock?

- Yes, the current definition is ambitious enough
- No
- No opinion

If no,

- The current definition should be updated to put clear limits to energy use and minimum levels of renewables and incorporate green-house gas emissions targets
- The current definition should be replaced by a definition of “zero emissions buildings”
- Other - please specify in comment box

\* Please specify:

*500 character(s) maximum*

The NZEB definition should be strengthened to ensure that new buildings are highly efficient and decarbonized. NZEB definition should integrate EE1 principle and support stronger & converging thresholds, based on reductions of energy needs for H&C and on the optimization of energy consumption. The EPBD should introduce common EU methodology going beyond cost-optimality for calculating performances. COM should suggest thresholds for reducing energy needs in line with climatic conditions of MS.

**Question 9.** Numeric thresholds or ranges for NZEBs are not defined in the EPBD. While this allows Member States to set their NZEB levels taking into account their national context, it also results in widely differing definitions from country to country. Is a more harmonised definition of NZEB necessary?

- Yes
- No, it is not necessary
- I don't know/ No opinion

If yes,

- Minimum thresholds for primary energy use in the building's operation should be defined in the EPBD for different climate zones
- Minimum renewable energy sources share should be introduced in the EPBD for different climate zones
- Both minimum thresholds for primary energy use and renewable energy sources share in the building's operation should be introduced in the EPBD for different climate zones
- Life-cycle greenhouse-gas performance should also be included
- Other - please specify in comment box

\* Please specify:

*500 character(s) maximum*

They should be harmonised, considering climate zones. Definition, based on EE1, should identify thresholds for primary & final energy consumption. Residual energy needs should be covered by RE from onsite/nearby sources. Promote reporting on operational & embodied carbon for new buildings & major renovations starting public & large constructions, contributing to 2050 WLC roadmap & gather data for benchmarking. ZEB thresholds should be introduced with high performance, 100% RE and net-0 emissions

## Deeper building renovations

**Question 10.** Deep renovation is understood to be a renovation that should generate at least 60% energy savings, whether carried out in a single stage or in a number of staged renovations. In your view, would it be beneficial to provide a legal definition of “deep renovation” in the EPBD?

- Yes
- No, a definition would add further complexity
- I don't know/ No opinion

If yes,

- The definition should relate to energy savings only
- The definition should relate to energy savings also expressed in terms of greenhouse gas emissions related to the use of energy
- The definition should relate to both operational and embodied greenhouse gas emissions covering emissions from the full life-cycle of buildings
- The definition should cover broader aspects that have an impact on the quality of renovations, such as health and environmental standards, accessibility for persons with disabilities, climate resilience or others - please specify in comment box
- Other - please specify in comment box

\* Other broad aspects? Please specify:

*500 character(s) maximum*

It should cover aspects like health and environmental standards.

## Mandatory minimum energy performance standards ('MEPS')

Mandatory renovation/minimum performance requirements are one of the most impactful measures for increasing the rate of building renovation and have already been explored and implemented in some Member States. Their aim is to firm up investors' expectations by setting a path for the improvement of the energy performance of different classes of buildings thus gradually increasing the average performance of the national building stock. Mandatory renovation/minimum performance requirements could be introduced progressively and target specific segments as a priority.

**Question 11.** In your opinion, should the EPBD introduce mandatory minimum energy performance standards to be applied in the EU, subject to specific conditions to be determined?

- Yes
- No
- I don't know/ No opinion

Please explain your answer:

*1000 character(s) maximum*

By setting a standard, MEPS will drive the desired depth of renovation and can boost renovation rates. The EPBD should start by introducing long-term primary and final energy reduction milestones for the building sector to set-up a clear direction and accelerate the renovation market. Member States could introduce MEPS according to their national specificities, e.g. starting from the worst performing buildings and differentiate between non-residential and residential buildings. Their design should build upon the analysis of the national LTRS to assess in which segments to deploy them first. Such standards could be phased-in proposing a trajectory for renovations starting with requirements for specific types of buildings e.g. either public, commercial or residential buildings, and extend them to other buildings over a period of time. They should be linked with enhanced EPCs that will define different classes of buildings. Energy classes should be introduced in all Member States.

**Question 12.** What type of minimum energy performance standards do you consider most appropriate?

- Building-level performance standards, focusing on the overall energy efficiency of the building (for example linked to an Energy Performance Certificates ('EPC') class or the energy codes, specific energy consumption, another carbon metric, etc.)
- Building element-level performance standards, setting specific minimum levels of building elements (for the envelope and/or the technical building systems including heating and cooling)
- Minimum quality standards, including also other aspects beyond energy performance, such as thermal comfort - please specify in comment box
- Others - please specify in comment box
- I don't know / No opinion

Please explain your answer:

*1500 character(s) maximum*

**Question 13.** In your view, for which category of buildings should mandatory minimum energy performance standards be applied?

*at most 2 choice(s)*

- All residential and non-residential buildings
- All residential buildings being sold and/or rented out
- All residential buildings
- A subset of residential buildings to be defined (please specify in comment box)
- All non-residential buildings
- All non-residential buildings being sold and/or rented out
- A subset of non-residential buildings to be defined (please specify in comment box)
- All public buildings (with a total floor area of more than 250 m2)
- Only to worst-performing buildings irrespective of their ownership and use profile
- Other (please specify in comment box)
- I don't know / No opinion

\* Other? Please specify:

*500 character(s) maximum*

MEPS should be introduced for all buildings. Their design should build upon LTRS. They could be phased for specific types of buildings (public, commercial or residential) and extended to others over period of time. The FR tertiary decree, for example, prescribes all tertiary buildings above 1000m2 to reduce final energy consumption by -40% by 2030, -50% by 2040, & -60% by 2050. MEPS, especially in residential sector, would require ambitious financing with grants for deep & staged deep renovation

**Question 14.** Do you think that mandatory minimum energy performance standards should be introduced:

- Yes
- No, I don't believe that mandatory minimum standards are appropriate
- I don't know / No opinion

If yes,

- Linked to specific moments in the life cycle of a building, for example a transaction (e.g. the sale, rental or lease of a building)
- On the basis of a timetable for a staged approach to achieve specific energy performance levels

- Other - please specify in the comment box

**Question 15.** In your view, what is the most important element that could guarantee a successful roll-out of mandatory minimum energy performance standards?

- The availability of financial support to buildings owners
- The correct identification of the worst-performing buildings
- The presence of a stable legal framework
- The availability of adequate workforce capacity to do renovations
- The availability of emerging technologies facilitating rapid renovation works
- Other - please specify in comment box
- I don't know / No opinion

\* Please specify:

*500 character(s) maximum*

The most important element to guarantee a successful roll-out of MEPS is the presence of a stable legal framework defined in EPBD. However, we believe that availability of financial support is equally important, especially to support renovations in residential segment with easy to access financial incentives for deep renovations & staged deep renovations available in all MS. If the finance and the legal framework are certain and stable, the technology and the workforce will find their way.

### Public buildings

**Question 16.** In your view, which of the following regulatory measures should be envisaged to increase the rate and depth of renovation of public buildings in a sustainable manner?

- Introduction of more stringent minimum energy performance requirements for renovation of public buildings
- Introduction of minimum energy performance standards in public buildings, with an obligation to achieve progressively more ambitious levels
- Introduction of life cycle aspects in the design, construction and operation of refurbished public buildings (e.g. circular approaches like extension of service life, adaptability and flexibility, reuse and recycling of materials)
- Introduction of climate resilience aspects in the design and operation of new and refurbished public buildings
- Other - please specify in comment box
- I don't know / No opinion

## Electromobility

**Question 17.** The provisions on electromobility in Article 8 of the EPBD targeting the installation of recharging points in car parks adjacent to buildings were recently introduced. With the strengthened climate ambition and the increased incentives towards the uptake of electric cars but also with the strong increase in (electric) bike /cargo-bike use, do you think there is a need to strengthen the requirements?

	Yes	No	I don't know/ No opinion
For new residential buildings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
For refurbished buildings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
For new non-residential buildings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
For refurbished non-residential buildings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Question 18.** In your view, what kind of requirement would be needed?

	Yes	No	I don't know/ No opinion
The installation of recharging points to support smart charging, allowing to monitor, control and optimise energy usage when recharging electric vehicles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The inclusion of provisions for recharging points for vehicles other than cars (e.g. e-bikes)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
To give owners of an apartment in multi-dwelling buildings the right to install a recharging point for their parking spot in the shared parking garage (right to plug)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other measures? Please specify:

*500 character(s) maximum*

**Question 19.** Are you aware of administrative barriers preventing the deployment of charging points in buildings in your country?

- Yes
- No

## Part B. Information provision and energy performance certificates

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### Energy performance certificates (EPCs)

Energy performance certificates (EPCs) is an instrument aimed at informing building owners, tenants and users about the cost of heating and cooling, savings that investments would bring and offer benchmarks to compare similar buildings. EPCs are also needed to link preferential financing conditions to quality renovations. Under the existing EU regulatory framework, EPCs are compulsory for buildings being built, sold or rented and the energy class of the EPC must also be shown in advertisement media. They are also compulsory for buildings over 250 m<sup>2</sup> occupied by a public authority and frequently visited by the public. EPCs can also be used to plan policy or to monitor the performance of measures when these are implemented. However, the coverage of such certificates strongly differs across Member States.

**Question 20.** Do you agree that the framework for Energy Performance Certificates should be updated and their quality improved?

- Yes
- No, it's not necessary
- Other - please specify in the comment box
- I don't know / No opinion

**Question 21.** Is harmonization of EPCs needed to accelerate the increase of building performance and how can it be achieved?

- Yes, it is needed and can be achieved by introducing a common template
- Yes, it is needed and can be achieved by other means - please specify in comment box
- Yes, it is needed but some national specification should be retained - please specify in comment box
- No, harmonisation is not needed
- I don't know / No opinion

Please explain your choice:

*500 character(s) maximum*

EPCs need to be updated and their quality improved. An important development would require EPCs to take into consideration real performance metrics to complement EPCs. Such an evolution should be based on EU wide certification scheme for energy efficiency meters.

**Question 22.** How would you rate the following elements in order to improve the quality and impact of EPC requirements?

- 0 – No opinion
- 1 – Not important
- 2 – Of little importance
- 3 – Moderately important

4 – Important

5 – Very important

	0	1	2	3	4	5
Improve training for independent experts	<input type="radio"/>	<input checked="" type="radio"/>				
Develop professional qualification schemes or labels for installers of technical buildings systems	<input type="radio"/>	<input checked="" type="radio"/>				
Improve quality control mechanisms	<input type="radio"/>	<input checked="" type="radio"/>				
Include further information on estimated costs, energy savings or cost savings	<input type="radio"/>	<input checked="" type="radio"/>				
Include information on non-financial benefits such as increased comfort and climate resilience	<input type="radio"/>	<input checked="" type="radio"/>				
Tailor the recommendations towards deep renovations	<input type="radio"/>	<input checked="" type="radio"/>				
Develop an accessible EPC database with further information on the EPC, explanation of the different terms, benchmarks and comparison with similar buildings	<input type="radio"/>	<input checked="" type="radio"/>				
Increase the number of mandatory indicators to include: greenhouse gas emissions, generation of renewable energy, breakdown of different energy uses (e.g. heating, ventilation, lighting, etc.) or type of systems installed	<input type="radio"/>	<input checked="" type="radio"/>				
Increase the interoperability with other tools such as digital building logbooks, SRIs and renovation passports.	<input type="radio"/>	<input checked="" type="radio"/>				

**Comment:**

*500 character(s) maximum*

The information included in the EPCs are not tailored to the needs of the owner and do not provide the information required throughout the energy renovation plan, finance and implementation. Moreover, smart data usage, energy flexibility and the impact of energy management systems are not covered in the current EPC regimes. The EPC reform should harmonize key indicators i.e. real energy performance in primary and final energy and GHG emissions reductions so to enable engagement by end-users.

**Question 23.** Which elements are the most important to ensure compliance with EPC requirements?

*at most 3 choice(s)*

- Provision of detailed guidelines for EPC (including use of visual identity, common logo, recommended indicators)
- More stringent penalties in case of non-compliance, for instance in relation to the advertisement of sales or rent of buildings

- Extend liability to all the market actors involved in the selling/renting of properties
- Making EPCs mandatory to access any financial incentive targeting buildings renovations
- Accessible EPC database with benchmarks allowing comparison with similar buildings
- Introduce information flow and cross-checks between EPC databases and other databases containing information on buildings or products (e.g. national building registry or cadastre, energy labelling database for products, digital building logbooks, other national statistics, etc.)
- Other measures - please specify in comment box

#### Smartness of buildings and wider modernisation

**Question 24.** The objective of the Building Renovation Passport (BRP) is to provide a long-term, step-by-step renovation roadmap for a specific building based on quality criteria, following an energy audit, and outlining relevant measures and renovations that could improve the energy performance and the quality of the building. The BRP schemes and initiatives in the EU are diverse and most of them have not reached their full potential, while some are still at the research phase. Which measures do you think could best support the uptake of a building renovation passport?

*at most 3 choice(s)*

- Guidelines and best practice exchange on how the BRP can support the objectives of the Long Term Renovation Strategy
- National/regional communication campaigns to increase awareness of the BRPs
- Training of energy experts
- Making funds, such as the European Energy Efficiency Fund or ELENA, available to the Member States for BRP development and implementation
- Guidelines on how to support and enable banks to offer a favourable interest rate on loans/mortgages which are linked to a BRP
- Legal requirement to be introduced in the EPBD review for the Commission to develop a common template for BRPs
- Legal requirement to be introduced in the EPBD review for the Commission to develop a voluntary BRP scheme

- Legal requirement to be introduced in the EPBD review stating that BRP becomes mandatory for certain building types (replicating the EPC regulations, buildings for sale, etc.) after 2030.
- No measure is necessary
- Other - please specify in comment box
- I don't know / No opinion

**Question 25.** The Commission has created a uniform scheme for Smart Readiness Indicators in the EU. The scheme is currently voluntary, and has the potential to promote the digitalisation of buildings and the role that buildings can play in smart sector integration.

What would you consider to be the best ways in which the Smart Readiness Indicator could support the role of buildings in smart sector integration?

- Continue with the current framework and focus on its implementation on a voluntary basis
- Introduce SRI as mandatory requirement for non-residential buildings
- Introduce SRI as mandatory requirement for all new buildings
- Introduce SRI as mandatory requirement for all buildings
- Support the development of links between the SRI and other schemes (e.g. EPCs, building renovation passports, building logbooks, etc.)
- Other - please specify in comment box
- I don't know / No opinion

\* Please specify:

*500 character(s) maximum*

Introduce SRI as mandatory requirement for all new non-residential buildings; while supporting the development of links between SRI and other schemes (EPC, building renovation passports, building logbooks, etc)

**Question 26.** Do you think that the EPBD can contribute in making a wider range of building-related data on the energy performance of a building and its related construction and renovation works, across its life cycle, available and accessible? (note: building related data can come from a variety of sources: SRI, logbook and EPCs, Level(s), grant schemes, building permits, digital models)

- Yes
- No

- No opinion

Please explain your answer:

*1000 character(s) maximum*

Much remains to be done to leverage the potential of smart solutions for more energy efficiency, transparency and making buildings active parts of a smart integrated energy system. The EPBD can contribute in making data available by making mandatory the requirements for residential buildings on continuous monitoring and effective control. The EPBD should promote increased data availability and transparency of products and system performance, leverage Artificial Intelligence in buildings and data analytics as a key enabler to monitor, manage and automatically adjust energy consumption. It should mandate the roll-out of digital design and operating tools (BIM) in construction work and renovation work when applicable.

### Part 3. Enabling more accessible and affordable financing for building renovation

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**Question 27.** The Renovation Wave Communication identify the need of sensible additional investments in building renovation in order to double the yearly renovation rate across Europe, decarbonise the building stock and achieve 2030 energy efficiency targets. Public financing alone will not be enough to achieve these objectives; it will be seminal to enable more accessible and affordable private financing options for building renovation. How would you rate the following possible forms of support to renovations?

- 0 – No opinion
- 1 – Not important
- 2 – Of little importance
- 3 – Moderately important
- 4 – Important
- 5 – Very important

	0	1	2	3	4	5
Public guarantee for commercial banks to offer low-interest loans for renovation of worst performing buildings	<input type="radio"/>	<input checked="" type="radio"/>				
Direct grants support to low-income citizens living on worst performing buildings	<input type="radio"/>	<input checked="" type="radio"/>				
ESCOs financing of low-interest loans payback through on-bill recovery	<input type="radio"/>	<input checked="" type="radio"/>				

Tax incentives during a period of time to provide additional economic support	<input type="radio"/>	<input checked="" type="radio"/>				
One stop shops for all types of renovation advice	<input type="radio"/>	<input checked="" type="radio"/>				
Support the development of energy efficiency mortgages and other innovative financing options that will enable private financing institutions to offer low-interest loans based on the improvements of energy performance of buildings or on building renovation passports	<input type="radio"/>	<input checked="" type="radio"/>				
Technical assistance facilities supporting the development of building renovation project for the building stock of local and regional authorities	<input type="radio"/>	<input checked="" type="radio"/>				

Other kind of support? Please specify:

*500 character(s) maximum*

**Question 28.** Deep renovations do not always result in a rapid return on investment. In your opinion, how public financial incentives can be used to stimulate deeper renovations across the EU?

*1000 character(s) maximum*

Deep & staged deep renovations not only provide the biggest energy savings & GHG reduction, they deliver most of health benefits & comfort for citizens, especially the most vulnerable. Public finance schemes should prioritise these renovations. In this respect, Technical Assistance is very relevant considering the limited public resources available and the finance gap to renovate the building stock. More systemic and coordinated approach to TA would enable proactive support for public authorities to map their building stock, prepare long-term renovation strategies, develop & aggregate renovation proposals, support blending of private & public investments. In addition, public funds for TA & capacity building could be invested in education & training of workforce (upskilling and reskilling) as well as in information campaigns to increase citizens & businesses' awareness about the benefits that renovations bring in terms of cost-savings, comfort, improved living conditions & productivity.

**Question 29.** Do you think that funding support to renovations should be linked to the depth of renovation?

- Yes
- No, it is not necessary
- I don't know / No opinion

If yes,

- The intensity of funding should depend on the depth of renovations based on the Energy Performance Certificates ('EPC') class achieved

- All public funding scheme for private building renovation should consider a mandatory minimum requirement of at least 60% energy savings
- All public funding scheme for private building renovation should consider a mandatory minimum requirement of at least 30% energy savings
- Other - please specify in the comment box

\* Please specify:

*500 character(s) maximum*

The highest level of support should be available for the most ambitious renovations. In addition, all public funding scheme for building renovation should be conditional to mandatory sharing of measured building performance data for minimum 5 years after start of renovation.

**Question 30.** In your view, which of the following measures would help to further support the renovation of public buildings?

- Technical assistance for public authorities (national, regional, local) to design and implement comprehensive renovation programmes (ELENA model), including linkages other related climate-resilience policies in urban and rural areas
- Enhanced deployment and capacity building for energy performance contracting in the public sector (including accounting rules)
- Financial incentives to support companies providing energy performance contracting
- Public-private partnerships to inform and assist efforts of public authorities for building renovation and ease access to financing
- Framework contracts at national, regional or local level with the specific objective of renovating public buildings
- Other measures - please specify in comment box
- I don't know/ No opinion

**Question 31.** As part of their Long-Term Renovation Strategies (LTRS), Member States must outline relevant national measures to reduce energy poverty. The Renovation Wave Communication indicates a number of measures to tackle energy poverty and renovate worst-performing buildings, including social housing. It also states that vulnerable households must be shielded from rent increases that may follow renovations. What do you think are the most important policy areas addressing energy poverty to be further reinforced?

*at most 3 choice(s)*

- Targeted financial support for lower and middle income households
- Minimum energy performance standards coupled with financing that limits the monthly net expenditure of the inhabitants
- Other additional legislative measures (please specify in the comment box)
- The Affordable Housing Initiative
- The Energy Poverty Observatory
- Other measures (please specify in the comment box)
- I don't know / No opinion

## Further comments

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**Question 32.** Do you have any further comments on policy aspects relevant for the decarbonisation of building which are not covered above?

*1000 character(s) maximum*

The following aspects should be taken into consideration as well:

- Full application and operationalization of the Energy Efficiency First (EE1) principle as *condicio sine qua non* for systemic reduction of energy demand, faster integration of renewables, resource and material efficiency as well as application of circularity principles.
- System integration in order to leverage the role of highly energy efficient buildings as active participants in the energy system, serving as energy storage units, enhancing demand side management and making the whole energy system much more decentralized, integrated and overall efficient.
- Other non energy related elements such as indoor air quality, thermal comfort and acoustics.
- Alignment with the EEAG aiming to a level playing field for aid intensity between EE and RE investments.
- Highly energy efficient and flexible buildings as key energy and strategic infrastructure as such to promote their access to capacity mechanisms.

## Contact

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