

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

Fields marked with * are mandatory.

Introduction

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

* 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

* First name

* Surname

* Email (this won't be published)

* Organisation name

255 character(s) maximum

* Organisation size

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

Transparency register number

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

* Country of origin

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

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- 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
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Part A. Planning and policy instruments

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

As highlighted by the recent Net-zero emissions roadmap by the International Energy Agency (IEA), a decisive strategic effort is needed to decarbonise heating and cooling energy supply in buildings. An ambitious timeline to phase out fossil fuels, as well as boosting electrification and the integration of renewables is required. EPEE fully supports the ultimate net-zero goal but cautions that defining a 'zero-emissions building' would be difficult due to the issue of embodied carbon.

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

Recent research covering the long-term renovation strategies (LTRSs) thus far submitted concludes that the strategies are largely not compliant with EPBD objectives. Member States are currently not sufficiently considering the crucial role of reducing energy consumption in the buildings sector and it is unlikely that the considerable increase in renovation activity required to achieve the EU's climate ambitions will be materialized under these plans.

In order to strengthen these efforts, the LTRS framework therefore needs to be aligned with the 2050 climate neutrality objective. An overarching pan-European objective to increase the rate of deep or staged deep renovations to 3% annually should be established.

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

The Commission should mandate the enactment of concrete measures to boost the uptake of efficient heating and cooling systems that integrate renewables, raise indoor environment quality and awareness of energy efficient solutions. The EPBD revision should ensure that the synergies between the provisions for the comprehensive assessments under Article 14 of EED and the renewable energy assessments under Article 15 of RED are strengthened and integrated (and aligned also in terms of timing).

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?

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The EPBD should encourage district and city authorities to set local carbon performance targets and encourage initiatives such as the Covenant of Mayors to disseminate best practices. To support this, EU and national legislation must provide the clearest signals in terms of decarbonisation targets, both overall and sectoral.

The EPBD must also ensure the necessary technical assistance to local authorities to support the scale-up of building renovations. The increased deployment of district heating and cooling (DHC) networks should be encouraged through financial and technical support to urban planning, local heat mapping etc. and by ensuring that local authorities fully understand the benefits and potential for renewable-based DHC. Where limits to such support exist, they should be removed.

Further, the EPBD should promote innovative financial schemes at the local level that support deep renovations and renewables generation.

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

Ultimately, both operational and embodied carbon should be reported on. Considering that the largest proportion of a building's carbon emissions is emitted in the use phase, measures to achieve operational energy savings and decarbonisation of energy supply should be prioritized. These measures must not be delayed by any potential methodological difficulties that might arise from integrating circular economy aspects into the EPBD and could lead to delays in its implementation.

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 roadmap¹ to reduce carbon emissions from buildings and advancing national benchmarking with Member States. How do you think the EPBD could contribute to this roadmap?

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EPEE welcomes this initiative by the Commission and believes that the EPBD can contribute by providing a link between the roadmap and existing strategic long-term tools. Such an instrument should also synergize with other EPBD tools, such as EPCs and BRPs, which would benefit from including carbon performance metrics underpinned by a long-term decarbonization roadmap. To ensure data availability for the roadmap, EPEE recommends the Commission propose a requirement to report on carbon emissions in EPCs. Further, the EPBD could contribute taking into account cost-optimality as a means of benchmarking the MEPS and EPC requirements. We understand that embodied carbon is more difficult to measure and track than operational carbon and that accounting (and reporting) whole life-cycle emissions will therefore need to overcome several challenges. Overcoming these must in the meantime not inhibit urgently needed improvements to buildings operational carbon performance.

¹The 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

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

From a consumer perspective, harmonized, or at least consistent, definitions for all EU member states would be useful. The proposed thresholds for primary energy use and renewable energy sources should also reflect the different climate zones while supporting a coherent approach.

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

An holistic deep renovation standard can be a useful tool to drive the rate of deep renovations. While energy savings are an important aspect, the standard should also consider factors such as indoor environmental quality (IEQ), contribution to demand flexibility, renewable energy use or the carbon performance of the building.

Staged renovation must be included to enable consumers to prioritize the type of work that best meets their personal circumstances (e.g. purchasing power etc.).

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

EPEE supports the introduction of MEPS as a useful tool to address persisting low renovation rates and depth in the EU. The ultimate objective – a 60% GHG emissions cut in buildings by 2030 and full decarbonization by 2050 – must be clearly reflected in the design of the tool. This concerns metrics, timing, target building categories, supporting policies. MEPS must require that energy efficient and renewable heating and cooling systems are installed in new buildings and buildings undergoing major renovation. Such requirements should not lead to an additional layer of regulation on top of the already existing product rules for technical building systems. Therefore, EPEE calls on the Commission to ensure complementarity between MEPS and the Ecodesign and Energy Labelling framework, by establishing a harmonised data platform for the assessment of TBS linked to the EPREL database. EPEE recommends that Member States require energy assessors to use pan-European data when applicable.

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

The decarbonization objective should be reflected in the metrics of MEPS, which should make clear reference to a buildings carbon performance. Additionally, performance metrics should support an improvement of systems efficiency and the principle of doing more with less energy. At the same time, product efficiency should also be incentivized. For example, heat pumps typically offer higher than 100% efficiency, by providing more energy service than is required as energy input. In addition, they also reduce air pollutant emissions and notably provide capacity for demand-side management. To promote these benefits, final energy should be emphasized as a metric, to make sure that MEPS promote the most efficient technical building systems that also contribute to energy system integration.

EPCs can serve as a starting point, but in their current form, most EPCs are not well suited to serve as basis for MEPS. Currently, EPCs assess energy performance not carbon performance, so a MEPS based on the EPC is likely to promote energy efficiency measures more effectively than fuel switching, demand-side response and heat storage measures. Linking MEPS with building renovation passports and digital building logbooks has the potential to alleviate some of these issues. However, EPCs schemes remain fragmented across the EU. MEPS should therefore be defined using supporting metrics in addition, , including percentage improvement in stock performance (energy or carbon), average performance etc.

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

A phased approach (starting with public and non-residential) should be accommodated but given the importance of the residential building category, it is important to already address its decarbonization potential in this revision, while addressing specific issues like split incentives, energy poverty etc. in an adequate manner. Considering the vastly different composition of the building stock across Member States, a MEPS addressing only certain subsets of buildings risks being discriminatory.

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

* Please specify:

500 character(s) maximum

Requiring energy efficient renovations at certain trigger points (sale, rental, heating system lifetime) limits the risk of missing opportunities to renovate, thereby avoiding lock-in effects. It can also incentivize single high-impact renovation actions, such as heating system replacement. Only relying on trigger points risks falling short of driving the scale of renovations needed. A clearly defined compliance timeline should therefore also be put in place.

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 introduction of MEPS needs to be part of a comprehensive policy package to achieve decarbonization of the building stock and overcome persistent barriers for renovation. All the above options need to be in place to achieve this, with the availability of sufficient funding being especially crucial.

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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
For refurbished buildings	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
For new non-residential buildings	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
For refurbished non-residential buildings	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

The inclusion of provisions for recharging points for vehicles other than cars (e. g. e-bikes)	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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

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 m² 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 across the EU employ vastly differing calculation methodologies. Some EPCs take into account measured energy performance, whilst others rely solely on calculated performance. Some take into account cooling needs, whilst others only consider heating needs. A more harmonised calculation methodology would allow for greater reliability and pan-European comparison of data. This would also exert a beneficial influence on the reliability of other instruments potentially linked to EPCs, e.g. MEPS.

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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Develop professional qualification schemes or labels for installers of technical buildings systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improve quality control mechanisms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Include further information on estimated costs, energy savings or cost savings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Include information on non-financial benefits such as increased comfort and climate resilience	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Tailor the recommendations towards deep renovations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Comment:

500 character(s) maximum

All the above options are important if EPCs are to become sufficient in terms of quality, comparability and reliability to interoperate effectively with MEPS, BRPs and logbooks. Building owners would also benefit from additional information provided by EPCs, e.g. carbon performance of the building or factors related to connectivity and indoor environmental quality. EPC data and its accessibility is also important, it could greatly assist decision-makers and inform policy-making.

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

* Please specify:

500 character(s) maximum

EPCs could be improved to provide guidance on public support available and provide public authorities with an instrument for conditioning state support in a fair and effective manner. Several Member States are for example already using EPCs as a prerequisite for accessing preferential loans (e.g. Lithuania, Portugal). EPEE recommends the establishment of a European platform for data on all heating and cooling systems, using EPREL data when applicable, or alternatively EN performance standards.

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

* Other? Please specify:

500 character(s) maximum

BRPs are, in concert with EPCs, a crucial tool to guarantee that building owners will receive sufficient information. Building owners should be furnished with a renovation roadmap, which should include MEPS compliance and climate neutrality. BRP uptake and coverage is therefore crucial and should be made mandatory based on certain conditions (e.g. public buildings, m2 threshold, commercial usage). For other categories, incentives for uptake, e.g. preferential loans, should be introduced.

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

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

EPEE believes that the successful deployment of digital building logbooks can contribute significantly to improving data availability and accessibility by bringing together data from a range of related instruments. The digital building logbook should be a repository for storing EPCs and related data such as inspection reports and available financial instruments, in order to reduce efforts and costs of EPC assessments. The logbook can also store the SRI assessment results and related data.

To enable the above, digital building logbooks should become more harmonized across the EU. The EPBD could serve as a legal basis for a standardised approach for data collection, data management and interoperability. Further, the EPBD could support the roll-out of digital logbooks by, for instance, making their use a requirement for public buildings.

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

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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Direct grants support to low-income citizens living on worst performing buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
ESCOs financing of low-interest loans payback through on-bill recovery	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tax incentives during a period of time to provide additional economic support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
One stop shops for all types of renovation advice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other kind of support? Please specify:

500 character(s) maximum

Depending on the recipient (i.e. housing companies, private home-owners, low-income households) different incentive schemes will be required. For instance, direct grants and subsidies are needed to support low-income segments, while favourable mortgage and loan conditions have less impact, as less financially solvent consumers might not have access to them in the first place. Developing a suitable financial strategy should be mandated as part of the LTRS.

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

By conditioning it through EPCs and BRPs, public financial support can be clearly prioritized to target the most cost-effective renovation works. In particular, the BRPs outline a long-term step-by-step renovation, resulting from an on-site energy audit fulfilling specific quality criteria and indicators established in dialogue with building owners. Not all renovation activities have the same rate of return on investment. For example, HVAC replacements typically have a higher average return on investment than most other types of renovation projects. The need to rapidly phase out fossil fuel heating, as also highlighted recently by the International Energy Agency, further supports a prioritization of heating and cooling replacements

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 given options are too simplistic. Few EPC schemes exist where requiring a certain label after works is adequate, while a 30% threshold may result in losing synergies between renovation activities, and a 60% threshold could be too prescriptive, deterring consumers from performing renovation activities in smaller steps. The overall logic should be that more ambitious renovations in terms of energy savings (or better aligned with long-term objectives) receive better financing conditions.

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

* Please specify:

1500 character(s) maximum

Certain forms of financial incentives and more comprehensive renovation programmes would be useful to support renovation of public buildings. In particular at the regional or local level, technical assistance is often required to ensure that capacities are sufficient to plan and deploy such programmes. Energy performance contracting creates the possibility for the public sector to overcome a series of financial and technical barriers to improve the energy performance of buildings. Clarifying accounting rules, as well as additional financial incentives, could help the uptake of this interesting tool.

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

Other legislative measures? Please specify:

500 character(s) maximum

Creating favourable conditions for the renovation of social housing should be a priority. Considering the potential extension of carbon pricing, the possible negative distributional impacts and existing split incentives should be addressed. In that sense, the EU legislative framework should promote, for instance, all-inclusive and temperature-based rents. Also, specific legislative measures are needed to earmark revenues from carbon pricing to help in particular lower income households.

Further comments

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

With the introduction of MEPS, increased renovation requirements, and planned introduction of carbon pricing for the building sector, addressing the distributional impact of these measures will be crucial. In addition to the options mentioned under Q31, EPEE would therefore encourage the Commission to look into ways of promoting innovative all-inclusive rental contract models (i.e. temperature-based, performance-based) to alleviate split incentive issues surrounding carbon pricing. Finally, EPEE wants to stress that, in addition to regulatory action, the installation of energy-saving HVAC technologies should be accompanied by energy-efficient occupant behaviour, which has a significant impact on energy consumption in residential and commercial buildings. Such behavioural changes can be incentivized by exposing occupants to feedback, or by taking into occupant behaviour in the planning stages of new buildings and major renovations.

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