

**2021 EPBD Open Consultation:
EuroACE – Energy Efficient Buildings
Final response**

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 (482 characters of 500 allowed, spaces included):

The EPBD must continue to focus on the operational energy performance of buildings as this remains the main source of carbon emissions. For new buildings, the NZEB definition should be revisited to reinforce the energy savings dimension in which all residual energy needs must be supplied by RES and include a whole life cycle carbon reporting for operational and embodied carbon separately. Decarbonisation of the existing building stock can best be achieved via this EE1 approach.

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? (973 characters of 1,000 allowed, spaces included):

There is a need for a more frequent update of the requirements of the LTRS and for a real action on the ground through stronger oversight and monitoring of MS actions. The 2030 milestone of the LTRS including an estimate of savings and of the number of buildings to be renovated, should become part of the binding NECP review process. There will also be a need to coordinate the LTRS with the expected new requirements on MEPS to ensure a clear trajectory for all buildings, especially worst-performing ones. Full coherence and complementarity between these instruments and possible

linkages with other EU Directives (i.e., the Energy Efficiency Directive, especially the mutually reinforcing interlinkage between Article 2a EPBD and Article 14 EED) and ongoing initiatives (e.g., Next Generation EU) should be pursued to bring the energy performance of the building stock in the EU up to speed to underpin efforts for the achievement of the 2030 and 2050 EU climate goals.

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: (497 characters of 500 allowed, spaces included):

LTRS must become more than a well-conceived plan of action. It must be an effective roadmap that MS use to guide their policy, financial and technical approaches to the societal challenge of transforming our building stock to be highly energy efficient and decarbonised by 2050. This will require more robust binding milestones in place, more data on buildings, segments, monitoring and assessment of their progress against 2030/2050 EU climate milestones and more political support going forward.

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?

(999 characters of 1,000 allowed, spaces included):

The key factor in the decarbonisation of buildings in the operational phase is that the buildings have a low energy need. Once the energy need is very low, the range and cost-effectiveness of carbon free sources of heating and cooling is much greater. With this logic, the EPBD must include stringent requirements on the significant reduction of energy needs as the most important step towards decarbonisation. To this end, establishing a clear plan (executed via neighbourhood approach, coupled with Technical Assistance and adequate financing) to promote holistic renovation and phase out fossil-fuel based heating systems is a way forward. This approach will reduce the energy demand, ensure the energy system integration and make the switch faster and more economically feasible. This will provide consumers with the multiple benefits that come with holistic energy renovations. Accelerating the replacement rate could also be done by linking the EPBD with Ecodesign/Energy Labelling Directives.

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 data centres
- The opportunity should be considered in the context of the revision evaluation mandated for 2026

Comment (482 characters of 500 allowed, including spaces):

Reporting mechanism for WLC (embodied/operational carbon separately) should be introduced for new buildings (possibly extended to large/major renovations starting from public buildings). This reporting should support data gathering, provide a level playing field for assessing, comparing and designing decarbonised buildings, as opposed to national diverging approaches. It should be based on EU wide harmonised and scientific calculation method and standards, building on Level(s).

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?

(1000 characters of 1,000 allowed, including spaces)

By ensuring, via stringent and EU harmonised implementation that the energy performance of buildings, both new and those undergoing renovation is very high, the EPBD can contribute significantly to a whole life cycle performance roadmap.

At operational/use phase:

*-strengthening NZEB definition to achieve zero energy/zero carbon buildings
-strengthening link between EPB and TBS performance assessment (consistent with Ecodesign requirements)*

At both construction/operational phases:

*-Inclusion of new buildings in WLC assessments
-Leveraging the ongoing work of parallel initiatives such as LEVEL(s) as the basis to deploy a harmonised calculation methodology and product data base to assess embodied carbon, especially when it comes to existing buildings and those undergoing significant renovations
-Creating a deep renovation standard that could set minimum quality levels to be achieved (accounting for broader aspects other than energy performance as IEQ, health, safety, CO² emissions).*

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

¹ 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.

Please specify (471 characters of 500 allowed, spaces included):

The current NZEB definition is unfit for the 2050 ambition and is open to a very wide interpretation. In addition, implementation at national level is very weak. To decarbonise our building stock, the NZEB definition (relating to new buildings) should be updated to require a drastic cut in energy demand through energy efficiency measures and techniques and to require that the residual energy need is FULLY supplied by RES (generated on site or via purchase agreement).

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 (414 characters of 500 allowed, including spaces):

EuroACE supports a re-definition of NZEB for new buildings. It should be updated against the 2050 climate goal. and it should require that energy needs are first reduced dramatically and that ALL residual energy needs are supplied by renewable energy sources. Still in the case for new buildings, a robust and harmonised reporting and calculation methodology for life cycle GHG performance could also be developed.

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

Please specify (472/500 characters)

A legal definition of deep renovation, especially if this will create preconditions to access financing, should relate to energy savings as a priority. A deeply renovated building should be compatible with 2050 climate neutrality goals. An evolution of the standard could cover broader aspects that have an impact on the quality of renovations and quality of life of building owners, such as health, indoor environmental quality, safety, accessibility, CO₂ emissions 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 (962 characters of 1,000 allowed, spaces included):

EuroACE has watched legislative efforts to boost the energy performance of our building stock unfold over the last 20 years. Unfortunately, we have seen that the renovation approaches adopted to date, largely based on incentives, have not had the desired effect. We observe that the big changes in day-to-day practices within the construction sector are always incited by mandatory obligations and that when obligations are in place, along with a balanced embedded framework (including financing, TA, PDA etc.) building owners accept them and implement them. It is therefore time to phase in well-designed and properly signalled MEPS in a legislative attempt to require highly ambitious and technically-sound energy renovations through the adoption and implementation of MEPS. MEPS will give the right signals to markets, help the whole value chain to engage and train, help eradicate energy poverty, and support specific building segments' renovation dynamics.

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 in comment box
- I don't know / No opinion

Please explain your answer (1,489 characters of 1,500 allowed, including spaces):

We believe that for a successful roll-out of MEPS, several elements should be taken into consideration, among which we see:

- *Overall visibility of the role of buildings in delivering the climate and energy transition, and understanding that both “carrots and sticks” will be deployed*
- *The role of 2050-proofed LTRS in making sure that these instruments are appropriately used to achieve its long-term goals and maximise results (i.e., energy savings, carbon performance, IEQ, health and safety), while avoiding any lock-in effects and in full respect of each building segment.*
- *A strong building data framework (EPC, BRPs, Digital building logbooks, SRI)*
- *Ad hoc financing at both EU and Member State level to ensure tailor made financing schemes in each segment or ownership structure, in particular for ensuring the availability of upfront finance to start the renovation works. These schemes should also allow for shorter payback periods for investors*
- *Ad hoc technical & project development assistance and overall accompaniment of investors throughout energy renovation projects*
- *Update of skills*

As to the type of MEPS that should be required, they should offer flexibility to MS on which segment to start with and legal certainty to building owners and investors as to the level of performance to be achieved by the set end date. The MEPS should be accompanied by enforcement rules that act as a deterrent to non-action, such as financial penalties being levied on building owners.

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: (496 characters of 500 allowed, including spaces)

To achieve our long-term climate goals, the whole building stock must be transformed to be highly energy efficient and decarbonised by 2050 at the latest. Considering the very low level of change in Member State practices on renovation since the introduction of the EPBD, it is crystal clear that more stringent requirements must be imposed. Our goals will only be met if all segments of the building stock are covered by MEPS, the phasing-in of which should be in line with national priorities.

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: (493 characters of 500 allowed, spaces included)

MEPS will be based on several factors that will vary with each MS. The key will be that they are designed in a manner that results in rapid successes linked to a vision about including all building segments over time, achieving a highly energy efficient and decarbonised stock by 2050 while capturing the full improvement potential. Evaluating and enforcing MEPS against set benchmarks will also be crucial. If we find we are not on target at a defined moment, then we must change in response.

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

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

Please specify (500 characters of 500 allowed, spaces included):

Public bodies should lead by example and become front runners in the challenge of transforming the EU building stock. Introducing more stringent energy performance requirements should be envisaged. More ambitious requirements should be coupled with the creation of a clear trajectory, with defined milestones to be achieved by a certain date, an embedded framework of technical assistance and financing to support implementation, and a strong monitoring and reporting framework to ensure compliance.

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	No opinion
For new residential buildings	X		
For refurbished buildings			
For new non-residential buildings	X		
For refurbished non-residential buildings			

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

	Yes	No	No opinion
The installation of recharging points to support smart charging, allowing to monitor, control and optimise energy usage when recharging electric vehicles			
The inclusion of provisions for recharging points for vehicles other than cars (e. g. e-bikes)			
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)	X		

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

If yes, please elaborate:

1000 character(s) maximum

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

Other means? Please specify (1,242 characters of 1,500 allowed, including spaces):

The EPC frameworks of the MS must take account of the national circumstances, building culture, available resources and climatic conditions. They should have a clear objective and be designed to achieve it. However, the EU should ensure a greater level of convergence of EPCs by requiring, for example, that all MS use the same scale from A to G, that all MS agree on the threshold for a "G" label (possibly all buildings that consume more than 350kWh/year/m²) and that the advice given on EPC must be presented as a Building Renovation Passport that will ensure it reaches its full energy performance potential well before the 2050 deadline for the transformation of the building stock in the EU to a highly energy efficient and decarbonised stock. Additionally, enhancing the quality and reliability of information stemming from the certificates is needed. EPC should also become more a dynamic tool and their data should be accessible to a wide range of different and pertinent stakeholders in the energy renovation value chain. To achieve this, digitalising EPCs and storing their

information in mandatory EPC national databases will be of key importance to support convergence and improve building performance related data across the EU.

Please explain your choice (461 characters of 500 allowed, including spaces):

Full harmonisation of the EPC framework across all MS of the EU is not fully possible due to regional and climatic variations. A certain level of flexibility will always be required. However, this does not mean that a greater convergence in the national methodologies (including inspection and quality control) cannot be achieved in the near future (e.g. ensuring all MS use the full scale from A to G) to make the EPC more comparable, transparent and reliable.

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	3	4	5
Improve training for independent experts				X	
Develop professional qualification schemes or labels for installers of technical buildings systems				X	
Improve quality control mechanisms					X
Include further information on estimated costs, energy savings or cost savings					X
Include information on non-financial benefits such as increased					X
Tailor the recommendations towards deep renovations				X	
Develop an accessible EPC database with further information on the EPC, explanation of the different terms, benchmarks and comparison with similar buildings					X
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				X	
Increase the interoperability with other tools such as digital building logbooks, SRIs and renovation passports.					X

Comment (497 characters of 500 allowed, including spaces):

The EPC remains an under-utilised, powerful instrument and all efforts to improve its desirability to building owners/occupants must be grasped. EuroACE suggests that including information on multiple benefits and introducing better quality control mechanisms are the two crucial features that the EPC framework should give attention to. Improved quality control should lead to more reliable information being gathered and highlighting non-energy benefits should motivate consumers to take action.

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 (497 characters of 500 allowed, including spaces):

Establishing a single reliable, secure building data gateway is more desirable and entails less administrative burdens (especially for consumers). For this reason, EuroACE believes that making the use of a Digital Building Logbook (DBL), where all pertinent information on buildings (EPCs, BRPs and SRI), is held, mandatory would be a step in the right direction. Also, possible provisions on SRI introduction could cover all new buildings or a 'pilot' building segment such as tertiary buildings.

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 (743 characters of 1,000 allowed, including spaces):

The EPBD has already set out several measures that permit the gathering of information on a range of building-related data and that can and should be reinforced. Existing measures should be better implemented by the MS. One way to improve on the current state of available information would be to make it an obligation for MS to create databases of the information gathered through EPCs and to require the adoption of Digital Building Logbooks (DBL) for all buildings by 2030. The DBL is the best place to store information on buildings and it can be done in modules. The information in DBL's should be aggregated and made accessible to a variety of actors for the purpose of coordinated planning of energy renovation programmes in the future.

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						X
Direct grants support to low-income citizens living on worst performing buildings						X
ESCOs financing of low-interest loans payback through on-bill Recovery					X	
Tax incentives during a period of time to provide additional economic support					X	
One stop shops for all types of renovation advice						X
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					X	
Technical assistance facilities supporting the development of building renovation project for the building stock of local and regional authorities						X

Other kind of support? Please specify (492 characters of 500 allowed, including spaces):

In the field of financing to support the upscaling of energy renovation, there is no one-size-fits all and it will be necessary to mobilise financing from all sources. However, no matter the source of financing, the use of tailored technical and project development assistance will be crucially important. Not mentioned above is the use of information campaigns, which should be continuously deployed throughout the lifetime of each and every renovation scheme or programme devised by the MS.

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?

(993 characters of 1,000 allowed, including spaces):

There are several mechanisms that public financial incentives can exploit to ensure deeper energy renovations occur in the near future. They can be used as non-refundable subsidies for those worst off in society to allow them a cost-free way of renovating; they can be used to incentivise those that can pay (e.g. 'Superbonus' scheme); they can be used to create guarantee funds that underwrite the perceived risk that commercial banks see in energy renovation projects; they can be used to improve the conditions of loans and mortgages to deliver more financial resources to building owners (e.g. the Green Mortgage initiative of EMI-ECBC). Whichever method is chosen, regional or local authority, the provision of full support through technical assistance to ensure the correct design, deployment, implementation and verification of funding schemes must be assured. It is crucial that dedicated support schemes are introduced for deep renovation (at least 60% of energy savings) in each MS.

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: (499 characters of 500 allowed, including spaces)

30% reduction in energy needs will be limiting in view of the multiple benefits stemming from ambitious renovations. Although few robust EPC schemes exist where requiring a certain label after works is adequate, the more ambitious the renovation in terms of reduction in energy demand, the greater the financial aid should be. This can encourage greater ambition and BRPs/certified professionals could advise investors to ensure that renovations are done in a meaningful manner and in a good order.

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: (1,124 characters of 1,500 allowed, including spaces)

The more we learn about the low rate of energy renovation of public buildings, the more we see that capacity building and technical assistance are essential and almost always lacking in public administrations. Therefore, boosting the access to capacity building and technical assistance is going to be the best additional measure to put in place. This is not to say that the other options above would not also have a good effect, but local, regional or national practices may not be favourable to the roll out of energy performance contracting or of public-private partnerships. As is often the case,

a menu of options available to these administrations is needed and expert, high-level technical assistance should always be able to identify the best option for each and every circumstance. This makes option 1 above the most powerful.

In light of the above, we also believe that the role of public-private partnerships such as one-stop-shops for energy renovation can indeed support public authorities in accessing financing and advisory services to carry out ambitious renovation projects, hence they should be supported.

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 (498 characters of 500 allowed, including spaces):

As most energy poor households are in the private rental sector, measures should be introduced that require renovation to a good minimum standard AND prevent rental increases that could lead to the renovated property being unaffordable to the incumbent tenant. Giving conditional grants to the landlords of such properties could be envisaged. For ex. requiring a rent freeze for a predefined period of years after the renovation, requiring repayment of the grant if the conditions are breached etc.

Further comments

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

(999 characters of 1,000 allowed, spaces included):

The EPBD revision should set clear 2030 targets for buildings to be renovated in line with our 2050 ambition for a carbon neutral economy

Existing requirements for setting national minimum energy performance requirements (MEPR) based on a cost-optimal methodology have reached their limits. The methodology should be revised to allow for the monetisation of multiple benefits and the inclusion of externalities. The result to be aimed for is that MEPR equate to achieving a zero energy and zero carbon level of performance well before 2050

IEQ indicators are critical to trigger deep renovations amongst end-users, thus they should be appropriately factored in to achieve our goals



Provisions on the roll out and use of technical building systems and building automation and control systems (BACS) should be reviewed. In an increasingly digitalised sector, the more extensive use of BACS for the operation and evaluation of energy performance in buildings increases and should be further exploited



For further information

Adrian JOYCE, Secretary General
+32 (0) 2 639 10 10
adrian.joyce@euroace.org
www.euroace.org

About EuroACE - Energy Efficient Buildings

EuroACE represents Europe’s leading companies involved with the manufacture, distribution and installation of energy saving goods and services for buildings. EuroACE members employ more than 220,000 people in these activities in Europe and have over 1,100 production facilities and office locations. The mission of EuroACE is to work together with the EU institutions to help Europe move towards a more efficient use of energy in buildings, thereby contributing to Europe’s commitments on climate change, energy security and economic growth.

EuroACE Members (2021)

