

Contribution ID: ff81505f-b2c3-46ae-b27a-43504218fc22

Date: 22/06/2021 12:16:28

# 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 ([https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal\\_en](https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en)), the Commission adopted on 14 October 2020 a strategic Communication “Renovation Wave for Europe - greening our buildings, creating jobs, improving lives” (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1603122220757&uri=CELEX:52020DC0662%20>). 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 (<https://www.consilium.europa.eu/en/press/press-releases/2020/12/11/european-council-conclusions-10-11-december-2020/>) 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 (<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12910-Revision-of-the-Energy-Performance-of-Buildings-Directive-2010-31-EU%20>).

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

([https://ec.europa.eu/energy/sites/ener/files/stakeholder\\_consultation\\_on\\_the\\_renovation\\_wave\\_initiative.pdf](https://ec.europa.eu/energy/sites/ener/files/stakeholder_consultation_on_the_renovation_wave_initiative.pdf)).

---

## About you

---

\*Language of my contribution

\*I am giving my contribution as

\*First name

\*Surname

\*Email (this won't be published)

\*Organisation name

*255 character(s) maximum*

\*Organisation size

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the transparency register

(<http://ec.europa.eu/transparencyregister/public/homePage.do?redir=false&locale=en>). 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.

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

#### \*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

**Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions (<https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement>)

---

## Part A. Planning and policy instruments

---

### Decarbonisation of buildings

**Question 1.** The long-term decarbonisation strategy (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018DC0773&from=EN>) 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*

Key is to have a definition that reflects buildings contribution to achieving climate neutrality by 2040 in line with the Paris Agreement. This means buildings should have a minimum energy use, supplied only from sustainable renewable sources - including energy produced by individual and joint renewables self-consumers or through participation in Renewable Energy Communities (REC, as defined in Article 2(16) of REDII)- and minimize their environmental impact across the lifecycle.

**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 ([https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/long-term-renovation-strategies\\_en](https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/long-term-renovation-strategies_en)) 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?

*1,000 character(s) maximum*

Member States (MS) should update their LTRS by 2024 the latest and provisions should align with the climate neutrality objective. This requires a 100% decarbonisation of the building stock which will not succeed without including EU's 195 million households. Energy communities and cooperatives as accessible and trusted local partners have proven to be key in ensuring citizen participation in, and support for, the energy transition. MS should support their development and activities to engage with citizens and vulnerable households on building renovation (citizen-led renovation) and sustainable heating and cooling. The Commission (COM) should provide MS with a template for LTRS, including support measures for REC on citizen-led renovation, and link LTRS requirements with REDII Articles 15 & 16 (administrative procedures) and Article 22 (REC). Moreover, actions to increase citizen participation, including for energy poor & vulnerable households, should be reinforced in the LTRS.

**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

Stronger monitoring and frequent revision of LTRS is crucial to reach the targets. The COM should safeguard that MS integrate citizen participation in renovation objectives and provide targeted support measures, both financial and technical, to communities and REC. E.g. as part of mechanisms implemented under Article 2a, point 3 A-E. Monitoring should extend to EU recovery funds, including the Recovery and Resilience Facility, to ensure citizen-led renovation initiatives by REC are included.

**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?

1,000 character(s) maximum

Empowering citizens, both tenants and homeowners, to take action can contribute significantly to accelerating building decarbonization in the residential sector. Key factors for empowerment are awareness, trust, technical and financial support, renovation skills, and accessibility of support and administrative procedures. Yet, as identified by the Inception Impact Assessment (IIA), this is where many barriers lie. Bottom-up initiatives such as community and citizen-led organizations, including REC, can be crucial partners for district and city authorities in alleviating these barriers. The EPBD, and MS through the LTRS, should actively promote such partnerships and provide guidance to district and city authorities on how to do this. To this end the COM should take up requirements and provide suggestions for MS in e.g. the LTRS (Article 2a) and on financial incentives and barriers (Article 10), including barriers on public procurement for services delivered by energy communities.

### 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) ([https://ec.europa.eu/environment/circular-economy/index\\_en.htm](https://ec.europa.eu/environment/circular-economy/index_en.htm)) 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

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

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

If yes,

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

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

1,000 character(s) maximum

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

### Nearly zero-energy buildings (NZEB)

**Question 8.** The EPBD requires all new buildings from 2021 (public buildings from 2019) to be nearly zero-energy buildings (NZEB). According to Article 2 ([https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L\\_.2018.156.01.0075.01.ENG](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2018.156.01.0075.01.ENG)) "nearly zero-energy building" means a building that has a very high energy performance, as determined in accordance with Annex I. The nearly zero or very low amount of energy required should be covered to a very significant extent from renewable sources, including sources produced on-site or nearby. Do you think that the current definitions for NZEBs are ambitious enough to contribute towards a fully decarbonised building stock?

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

If no,

- The current definition should be updated to put clear limits to energy use and minimum levels of renewables and incorporate green-house gas emissions targets

- The current definition should be replaced by a definition of “zero emissions buildings”
- Other - please specify in comment box

\*Please specify:

*500 character(s) maximum*

All new buildings must be fossil fuel-free from 2025 at the latest, with the ultimate aim to phase out the use of all fossil-based systems also from existing ones. REScoop.eu calls for a complete fossil gas phase-out by 2035. The NZEB definition should thus be revised towards highly energy efficient and positive energy buildings supplied by 100% renewables, while introducing passive and nature-based elements in new buildings' design to reduce their whole life cycle impact.

**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

### 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:

*500 character(s) maximum*

A legal definition of deep renovation can provide clarity and reliability for all the actors involved in the renovation process, as well as to steer investments towards those interventions that reach the highest levels of performance. It should be based on primary energy savings of at least 75% and linked to the achievement of minimal primary energy needs after renovation. For the diverse residential building stock the definition should be flexible to allow tailor made approaches.

## 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:

*1,000 character(s) maximum*

The existing experiences of MEPS in different countries, including some EU Member States, have proven the effectiveness of this policy tool in driving renovation rates upwards and increasing their depth. MEPS should be introduced for the whole building stock, including the residential sector and prioritising worst-performing buildings. To ensure a socially just implementation, adequate technical (e.g. cooperative and community based one-stop-shops) and financial support must be provided, alongside social safeguards and measures to preserve housing affordability. MEPS should be linked to deep renovations, prioritising one-staged deep renovations to prevent lock-ins and avoid, whenever possible, subsequent interventions occurring on the same building. The timeline for MEPS enforcement should be set in line with the climate neutrality objective. To this end, strengthened LTRS should play a key role by setting benchmarks for the performance levels to be achieved by the different segments.

**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:

*1,500 character(s) maximum*

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

*at most 2 choice(s)*



- All residential and non-residential buildings
- All residential buildings being sold and/or rented out
- All residential buildings
- A subset of residential buildings to be defined (please specify in comment box)
- All non-residential buildings
- All non-residential buildings being sold and/or rented out
- A subset of non-residential buildings to be defined (please specify in comment box)
- All public buildings (with a total floor area of more than 250 m<sup>2</sup>)
- Only to worst-performing buildings irrespective of their ownership and use profile
- Other (please specify in comment box)
- I don't know / No opinion

\*Other? Please specify:

*500 character(s) maximum*

MEPS for residential buildings should provide more flexibility to allow for tailor made solutions, especially for vulnerable households or when collective action is necessary (e.g. for apartment buildings).

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

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

If yes,

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

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

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

\*Please specify:

*500 character(s) maximum*

Adequate technical and financial support through citizen-led and non-profit one-stop shops is crucial in enabling households to renovate their homes. Moreover, renovation policy should seek to actively empower citizens to take action, for example through energy communities.

## Public buildings

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

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

**Electromobility**

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

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

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

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

Other measures? Please specify:

500 character(s) maximum

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

- Yes  
 No

---

## Part B. Information provision and energy performance certificates

---

### Energy performance certificates (EPCs)

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

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

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

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

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

Please explain your choice:

*500 character(s) maximum*

**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 checked="" type="radio"/> | <input 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 type="radio"/>            | <input checked="" type="radio"/> |
| Tailor the recommendations towards deep renovations   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> |
| Develop an accessible EPC database with further information on the EPC, explanation of the different terms, benchmarks and comparison with similar buildings  | <input type="radio"/> | <input 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

**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

**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:

*1,000 character(s) maximum*

## 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 type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> |
| ESCOs financing of low-interest loans payback through on-bill recovery   | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            |
| One stop shops for all types of renovation advice  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> |
| Support the development of energy efficiency mortgages and other innovative financing options that will enable private financing institutions to offer low-interest loans based on the improvements of energy performance of buildings or on building renovation passports | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input checked="" type="radio"/> | <input 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 type="radio"/>            | <input checked="" type="radio"/> |

Other kind of support? Please specify:

*500 character(s) maximum*

To upscale renovation we need a mix of solutions, mobilizing financing from all sources and provide technical and project development assistance tailored to homeowners and tenants. To align with the priorities of the Renovation Wave MS should support bottom-up activity such as citizen-led renovation program's being run by RECs which are perfectly positioned to engage and support households on improving energy efficiency of their homes while linking this to generation of renewable energy.

**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?

*1,000 character(s) maximum*

Policies to stimulate deeper renovations should not focus just on the economic return of investment but also on the quality improvements resulting from renovation. From citizen-led renovation services currently operating in different MS we know that households value factors such as comfort, health, and environment as much as, or even more than, reduced utility bills. Yet, households often see deep renovations as complex and disrupting. Developing public financial incentives to stimulate the development of non-profit one-stop-shops - such as those being run by REC - can help overcome this. By providing impartial technical advice, project coordination, and making financing and administrative procedures accessible such citizen-led renovation programs stimulate deep renovation of homes. Specifically for vulnerable households larger grant amounts should be made available to help cover the initial investment and added investment of deep renovations.

**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*

Although deeper renovations should be able to benefit from extra funding support, and households should be encouraged to undertake deep renovations, it should also be recognized that the residential sector needs a more flexible approach to accommodate the large diversity in buildings and household situation. Renovations can be disrupting for households, and sometimes a staged renovation is the only option. Especially when taking into account complex collective decision making in stacked dwelling

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

- Technical assistance for public authorities (national, regional, local) to design and implement comprehensive renovation programmes (ELENA model), including linkages other related climate-resilience policies in urban and rural areas
- Enhanced deployment and capacity building for energy performance contracting in the public sector (including accounting rules)
- Financial incentives to support companies providing energy performance contracting

- Public-private partnerships to inform and assist efforts of public authorities for building renovation and ease access to financing
- Framework contracts at national, regional or local level with the specific objective of renovating public buildings
- Other measures - please specify in comment box
- I don't know/ No opinion

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

*at most 3 choice(s)*

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

Other measures? Please specify:

*500 character(s) maximum*

REC are well positioned to approach and support vulnerable households on the topic of renovation. It is crucial that vulnerable households have a trusted partner that provides accessible technical assistance and support in accessing finance and handling administrative procedures. REC are rooted in communities and social networks, often staffed with local residents, making them more accessible for vulnerable households. Specific support is need for REC to provide these services.

---

## Further comments

---

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

*1,000 character(s) maximum*



The top down focus of EU policy for building decarbonisation risks not making use of the potential that citizen and community-led initiatives have to engage with Europe's 195 million households on energy savings and renewable energy for heating/cooling. To better support REC and citizen-led renovation programs a revised EPBD should provide an enabling framework for their activities. To this end the COM should, among other things: 1) require MS to include targeted measures in their LTRS on citizen empowerment and (financial) support for REC, 2) support and encourage district and municipal authorities to partner with citizen-led initiatives in empowering households on renovation, 3) assist and advise MS on citizen inclusion and the potential of renovation services delivered by REC (including through Article 20), 4) Support MS in developing financing schemes for citizen-led renovation, and assess how EU level funds and public finance can be used to this end through an updated Article 10.

## Contact

ENER-BUILDINGS@ec.europa.eu

---