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

Other? (500 characters max)

The EPBD should remain focused on reducing energy needs. For new buildings, a more ambitious and robust nZEB definition is required (see Q8). In view of developing the 2050 whole life-cycle performance roadmap, the EC should explore how a zero emission building stock can be achieved by combining ambitious reduction of energy needs for heating and cooling with the phase out of fossil fuels and gradual introduction of operational and embodied carbon metrics based on a common European 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? (1000 characters max)

MS should update their LTRS by no later than 2024 to deliver on the revised 2030 Climate Target Plan and Fit-For-55 Package. The ambition of LTRS should be aligned with climate neutrality by 2050, which requires full decarbonisation of the building stock in line with Energy Efficiency First and attainment of an annual deep renovation rate of 3% by 2030. The EC should

provide MS with a template for LTRS (common measurable progress indicators, milestones, and baseline year) to simplify drafting, reporting, and monitoring. This would enable the EC to better analyse, compare and deliver EU wide milestones and progress indicators for 2030, 2040 and 2050. The EC should be empowered to provide MS recommendations on how to improve LTRS and undertake a gap-filling exercise, both on ambition and delivery. This way MS will benefit more directly from EC support in drafting LTRS, which would be particularly useful for guidance on absorption of EU funds and providing technical assistance.

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

If other, please specify: (500 characters max)

The LTRS framework would benefit from national renovation targets and dedicated requirements aimed at promoting deep renovation via reduction of energy need. LTRS should indicate the projected evolution of the national rate of deep renovations carried out on an annual basis, together with an outline of policies dedicated to boosting this rate, thereby distinguishing between policies addressing deep renovation and those targeting renovation more broadly.

Question 4. Which measures would you add in the EPBD to further support district and city authorities to increase energy efficiency in buildings and to accelerate the rate of replacement of boilers by carbon free ones based on renewable energy? (1000 characters max)

Stronger requirements placed on MS to increase the rate of renovation – combined with financial support via the MFF, RRF and carbon trading revenues – will result in greater resources allocated to local authorities for training schemes, information tools and advisory services. The thermal performance of a building should be inspected when replacing a boiler to avoid oversizing the heating system. Incentives for boiler replacement should be conditional on meeting minimum standards for the building envelope. Such measures will help to alleviate

energy poverty, improve health and comfort conditions, which can otherwise be neglected, as boiler replacements alone lead neither to reduced energy bills, nor reduced energy waste, discomfort or leaks, which are all linked to a poor building envelope. An EU/national level timeline to gradually phase out fossil fuels for heating and cooling, integrated in the LTRS, would facilitate this process.

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: (500 characters max)

Any reporting obligations introduced in the EPBD should be based on a harmonised EU methodology (see Q7). Reporting obligations would be particularly beneficial for new buildings. Public buildings and large non-residential buildings (>5000 m²) should serve as front-runners, before the framework is expanded to all new buildings. Such a framework could also be applied to large renovation projects, which follow the same planning, design, construction and commissioning path as new constructions.

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 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 max)

The EPBD should continue to drive the reduction of energy need for heating and cooling for both new and existing buildings, this way addressing a major share of building emissions. To complement instruments like the EU ETS or CPR – which aim to address the embodied carbon of materials and products – the EPBD can contribute to reducing embodied carbon by tackling the information deficit on building emissions. To do so, the EPBD should introduce reporting obligations for certain types of buildings (see Q5). To enable Member States to introduce such reporting obligations in a coherent manner – avoiding mushrooming of divergent national approaches – the Commission should propose a common EU harmonised framework for calculating building emissions in the EPBD, based on LEVEL(s) and EN15978. At product level the current EPD system based on EN15804+A2 should be used as the reference for reporting emissions (to be further mandated via the CPR).

Nearly zero-energy buildings (NZEB)

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

☐ Yes, the current definition is ambitious enough
☒ No

☐ No opinion

If no,

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

Please specify: (500 characters max)

The definition should set clear limits on energy needs for heating and cooling, which will help to increase the share of renewables in the overall energy mix, reduce peak demand and provide systemic efficiency to the grid, thereby protecting those living in the worst performing buildings from disproportionate cost increases. nZEB buildings should become 2050 climate neutral ready buildings from a carbon perspective. Additional indicators could include IEQ, circularity, safety and resilience.

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 characters max)

Minimum thresholds for heating and cooling energy needs should be defined in the EPBD. 'Energy need' is the main indicator of the quality of the energy concept of the building and is already in line with the EPBD methodology and standards used to support the directive. The definition should be as far as possible made consistent and harmonised across countries, while leaving flexibility to adapt it to different climate zones.

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 characters max)

Increasing the rate of DR is today's greatest challenge, as currently on average renovations result in a mere 9% energy savings. Therefore, the DRS should focus on the reduction of energy needs. Whole life carbon data should progressively be reported for deep renovation projects. Deeply renovated buildings should be frontrunners in compliance with IAQ, safety, climate resilience, and circularity criteria.

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 characters max)

Whilst the short-term objective of MEPS should be to target the worst-performing buildings, the framework should also promote deep renovation to avoid lock in effects. Legal certainty must be ensured with a proper notice on when the requirements will be increased to a higher energy class. By mapping the trajectory to 2050, MEPS can serve to support deep renovation today, as building owners will be incentivised to prepare for tighter future compliance requirements well in advance, provided that a supporting framework is in place to reward those opting for deep renovation instead of merely meeting current MEPS. This supporting framework should include adequate financing tools, precise information, administrative and technical assistance for building owners and training schemes for professionals carrying out energy performance assessments. All of these measures – in combination with strengthened EPCs and deployment of BRPs – will drive deep renovation.

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 characters max)

Eurima supports building-level performance standards, focusing on the energy need for heating and cooling, linked to an Energy Performance Certificate (EPC) class. EPCs and MEPS should be regarded as two fundamental, mutually reinforcing components of the EPBD. High quality EPCs with reliable information on building performance are crucial to a successful rollout of MEPS. EPCs and MEPS are also mutually reinforcing in terms of consumer awareness and compliance: MEPS based on EPC data could provide a welcome boost to quality enhancement and EPC adoption, particularly by third parties like real estate agents, banks, contractors etc. Meanwhile, the deployment of MEPS provides a solid but urgent rationale for upgrading the quality of EPCs and ensuring that assessments are carried out by certified professionals performing real visits to buildings. MEPS can also serve as a regulatory tool for expanding the coverage of EPCs and ensuring compliance. Building-level standards would also enable better alignment with Building Renovation Passports, as existing BRPs holistically consider the whole building.

Question 13. In your view, for which category of buildings should mandatory minimum energy performance standards be applied? (at most 2 choices)

- [x] 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
- [x] Other (please specify in comment box)
- [ ] I don't know / No opinion

Other? Please specify (500 characters max)

MEPS should cover the entire building stock. Leaving out the residential sector would result in a failure to tackle energy poverty and thereby harness the wider social benefits linked to renovation.

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

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

If yes,

☒ Linked to specific moments in the life cycle of a building, for example a transaction (e.g. the sale, rental or lease of a building)

☒ On the basis of a timetable for a staged approach to achieve specific energy performance levels

☐ Other - please specify in the comment box

Question 15. In your view, what are the most important elements that could guarantee a successful roll-out of mandatory minimum energy performance standards?
(only one choice can be selected)

- ( ) 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

Other? Please specify:

A successful MEPS framework must establish a stable legal framework, whilst simultaneously strengthening key supporting elements, such as the availability of financial support and technical support for building owners, and the availability of adequate workforce capacity to carry out deep renovation projects. Only by combining these measures can MEPS deliver on renovation in a just and effective manner – tackling energy poverty and avoid lock-in effects.

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? (only one answer can be selected)

- ◉ 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 max)

All public buildings undergoing work should be required to reach a deep renovation standard (achieving at least 60% energy savings). Such an approach would be compatible with existing EED Art. 5 provisions that currently require MS to annually renovate 3% of the floor area of buildings owned or occupied by central government. Rather, the combination of the two measures would ensure that both the speed and depth of renovations is aligned with the objective of a climate neutral building stock by 2050.

---------- *Questions 17-19 concerning e-mobility have been removed from this template* ----------

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 characters max)

Currently, most Member States favour simple, low-cost surveys that can be carried out quickly and remotely, but fare poorly in terms of accuracy and reproducibility – two factors that are key for ensuring the credibility of EPCs and the tailored recommendations stemming from this data. To address this, all energy performance assessments should be carried out on-site by certified professionals. More harmonised, comparable and solid asset-based calculations using EPB standards should be progressively complimented with real performance metrics.

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

Comment: (500 characters max)

Many of the above mentioned elements – particularly the training of experts and quality control mechanisms – are urgently needed to upgrade the quality of asset-based calculations. In addition, calculated performance should be progressively complimented with real performance metrics.

Question 23. Which elements are the most important to ensure compliance with EPC requirements? (at most 3 choices)

- ☐ 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

- [x] 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 modernization

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 choices)

- [ ] 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
- [x] 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
- [x] 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
- [x] 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

Other? Please specify:

Well-insulated buildings act as an enabler for deploying smart technical building systems. A well performing building envelope offers occupants the flexibility to receive energy when it is available, thereby allowing for an effective integration of renewables in the energy system during the entire year. Therefore, by taking into account the energy needs of the building, the SRI can contribute to both demand side flexibility and integration of renewables.

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 characters max)

Recognising the value of a central/regional EPC database, most Member States have voluntarily opted to create an EPC register. However, the approaches taken vary widely in terms of data stored, possibilities for data aggregation and quality assurance. All EPC data should be stored in a standardised, machine-readable format to ensure that individual data points can be extracted/ aggregated as required. This will allow for pan-European aggregation by the Building Stock Observatory, as envisaged in the Renovation Wave Strategy. EPC registers are vital for identifying the worst performing buildings as well as designing policies and solutions that promote renovation. Therefore, EPC registers should be accessible for authorised stakeholders supporting local renovation strategies and developing market solutions for building owners.

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

Other kind of support? Please specify: (500 characters max)

Question 28. Deep renovations do not always result in a rapid return on investment. In your opinion, how can public financial incentives be used to stimulate deeper renovations across the EU? (1000 characters max)

When state subsidies form the core of a broader supporting framework that leverages commitments from both the public and private sector, impressive co-financing ratios of state funding to total funding can be reached (e.g. 1:9 ratio in the case of Germany's KfW scheme). This "waterfall effect" can be achieved through engagement with private banks to take advantage

of their broad reach and transaction processing capacities, whilst providing subsidised interest rates and risk guarantees for green mortgages. Societal benefits of renovation increase significantly when an nZEB level or higher rate of energy performance is attained (e.g. in terms of alleviating energy poverty, improved public health or allowing for greater penetration of renewables). Therefore, it is only appropriate that proportionality greater public support is provided to those projects opting for deep renovation.

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 schemes for private building renovation should consider a mandatory minimum requirement of at least 60% energy savings
- ☐ All public funding schemes for private building renovation should consider a mandatory minimum requirement of at least 30% energy savings
- ☒ Other - please specify in the comment box (500 characters)

Public support, regulatory measures like MEPS and information tools like EPC/BRP should all guide building owners towards deep renovation to avoid lock-in effects. Recognising that it might not be possible to condition all public funding schemes on attaining at least 60% energy savings, it is important to ensure that support from all schemes increases proportionately to the depth of renovations based on EPC class achieved.

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 choices)

- ☑ 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

Member States should consider subsidies for EPCs and BRPs, which are both essential for driving a higher rate and depth of renovations. Schemes integrating subsidies for obtaining an EPC or BRP in combination with one or two energy efficiency measures should be supported, especially for vulnerable dwellings.

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 characters max)

The EPBD review provides a much needed opportunity to boost energy savings, reduce CO2 emissions and deliver a high societal return on investment through the multiple ancillary benefits of investing in the building and construction sector. When reviewing the EPBD, a coherent, consistent and mutual reinforcing framework must be ensured with the full package of legislation and measures supporting the implementation of the European Green Deal. The Energy Efficiency First principle should be recognised as the guiding and overarching principle in the EPBD revision, prioritising the reduction of energy needs for heating and cooling, according to the Trias Energetica. For further details, please consult our response to the EPBD Inception Impact Assessment (Roadmap): https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12910-Energy-efficiency-Revision-of-the-Energy-Performance-of-Buildings-Directive/F2012281_en