

EUROPEAN DATAWAREHOUSE GMBH

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**EUROPEAN
DATAWAREHOUSE**

18 May 2022

EUROPEAN COMMISSION

Directorate-General for Energy
European Commission
1049 Bruxelles/Brussel
Belgium

Directorate-General for Financial Stability, Financial Services and Capital Markets Union
Units C1 and B1
European Commission
1049 Bruxelles/Brussel
Belgium

Subject: Proposed improvements related to the revision of the Energy Performance for Buildings Directive

Dear Madam, Dear Sir,

Mindful of the crucial importance of the building sector for achieving the European Union's (EU) energy and environmental goals, the European DataWarehouse (EDW) and the European Banking Federation (EBF) would like to bring to your attention a set of proposals for incorporation into the revised Energy Performance for Buildings Directive¹.

The objective of our proposed solutions is to overcome the current barriers hampering the renovation wave promoted by the European Commission. More specifically, we advocate the following measures to be taken in the context of the revision of the Energy Performance for Buildings Directive:

1. Provision of a clarification with respect to the General Data Protection Regulation, to enable the publication and access to all existing Energy Performance Certificates (EPC) across Europe in an open manner (i.e., all EPCs available for download for a given area for a given period).
2. Introduction of a standardised, machine-readable EPC document.

¹ Please note that the EDW has also responded to the consultation on the revision of the Energy Performance of Buildings Directive proposed by the European Commission in December 2021.

3. The EPC across countries should be comparable, based on CO2 emissions.
4. Promoting the use of the EPCs across Europe, by offering economic or tax incentives, e.g., by making the EPC document expense potentially fiscally deductible for homeowners.
5. Promoting good practices and examples of EPC databases that include quality and open access sustainable information, such as ADEME in France and CENED in Italy.
6. Strengthening the mandate of the EU Building Stock Observatory, particularly in the countries and regions where there is no EPC database available.

We are confident that the incorporation of the proposed solutions in the revised Energy Performance for Buildings Directive would have a positive impact on the development of EU sustainable finance strategy through helping the financial industry to comply with the applicable EPC- related reporting requirements under, amongst others, the Securitisation Regulation². We further consider that the information level would be better if EPC information was registered on the property rather than on the building owner.

The EBF and EDW remain at the disposition of the European Commission for any queries related to this letter.

Yours faithfully,



Christian Thun

Chief Executive Officer

European DataWarehouse GmbH



Wim Mijs

Chief Executive Officer

European Banking Federation

Cc: Denisa Avermaete, Senior Adviser, Sustainable Finance, European Banking Federation

Cc: Marco Angheben, Head of Business Development and Regulatory Affairs, European DataWarehouse GmbH

² According to the Securitisation Regulation (Regulation (EU) 2017/2402), reporting entities are expected to provide the EPC and EPC provider data for residential real estate, auto and consumer loans, if available.