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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
If yes,	It should include greenhouse gas emissions covering the whole life-cycle of buildings | 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:	For buildings renovation, the Energy Efficiency First principle does not lead always to decarbonisation and could be not cost effective. It means that it doesn't allow to prioritise the most important actions for climate. The EPBD revision should focus on climate-efficiency centric approach, with the need to reduce energy consumption and even more GHG emissions with more ambitious targets on carbon. The Energy Efficiency First principle should be replaced by the Carbon efficiency first principle
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 Com	Yes
If yes, how?	As the CO2 emitted by operating buildings over the next decade will have a biggest impact on climate mitigations than the ones emitted at mid-century, LTRS should put the emphasis on intermediate milestones before the 2050 carbon neutrality target. LTRS should include a graduate pathway, with a dedicated 2030 milestone showing how building sector can comply with the Fitfor55 objective. It would make easier the way to monitor each LTRS and redesign it before climate deadlines. It would also help Member States to focus on quick and efficient measures that could generate the highest rates of energy and emissions savings, primarily by speeding up the fossil energies phase-out in new and existing buildings towards low-carbon energies such as electricity. The EPBD provisions should also focus more on dynamic energy performance and encourage the uptake of energy management solutions such as Energy performance Contracts.
Question 3. Should the monitoring of the objectives identified by MSs in their LTRS be strengthened?	Yes
If yes,_1	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
Please specify:_2	The LRTS monitoring should be strengthened by converting the objective of "nearly zero energy building" to a "nearly zero energy and emission building" and integrate it into all new building requirements to take into account buildings' GHG emissions and by requesting more data to allow assessing the renovation works impact.
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?	The focus must be given to the transformation of fossil energy consumption into low-carbon energy (not only renewable energy) consumption. Energy Performance Certificates (EPCs) could be a powerful tool to reduce GHG emission. To do that, the Art. 11 of EPBD must be revised in order to introduce the possibility to refer to final energy consumption alongside primary energy (to be consistent with the Energy Efficiency Directive) and introduce an energy-related emmissions criterion. This carbon component should be integrated to the mandatory minimum energy performance standards proposed by the EC, and could be positively introduce in the Building Renovation Passport.
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
If yes,_3	For all buildings (new buildings and renovations)
Comment:	Measures to account carbon emissions over the entire life cycle of all buildings (new buildings and renovations) could be implemented in a progressive manner: first for new buildings and in a second phase for renovated buildings (80-90 % of carbone emissions are due to the exploitation phase in existing buildings to be renovated).
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
If yes,_4	For new private buildings (residential and non-residential) | For new public buildings | For renovations of public buildings | In case of private buildings, only for a subset of non-residential buildings such as offices or commercial buildings

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 con	It should be necessary to well dissociated the usage phase to the phase of fabrication/construction of components) in order to have 2 distincts indicators : it will allow to define adapted decarbonation trajectories taking into account the different level of maturity (methodology, practices and technical solutions) and avoid compensation effects. Methods of whole life cycle evaluation of buildings need also to be harmonised and structural parameters to be well defined such as life span of buildings, consideration of low carbon materials. In all new construction buildings as well as renovation strategies, switching from fossil fuels (coal, oil, gas) to available low-carbon energies (electricity, biomass, and renewables district heating) is compulsory and has to be promoted by EPBD. The EPBD has to accelerate the phase-out of fossil-fuel energies and support the shift to low-carbon energies in the operational phase of buildings.
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	No
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 | Other - please specify in comment box
Please specify:_5	The NZEB definition must be revised to integrate the climate performance of buildings alongside the energy one in order to include the reduction of GHG emissions in all new building requirements.
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. I	Yes
If yes,_6	Minimum renewable energy sources share 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:_7	NZEB definition must be revised to integrate the climate performance alongside the energy one in order to include the reduction of GHG emissions in all new building requirements. NZEB requirement scope should be extended to Nearly-Zero Emission Buildings. NZEB needs to be well defined in order to avoid mechanisms of compensation : based on annual balance, production PV in summer can compensate fuel energy consumption in winter, without any physics correlation between production and consumption.
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	Yes
If yes,_8	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 | Other - please specify in comment box
Other broad aspects? Please specify: Please specify:_9	Buildings need to be more resilient against climate change impacts. EPBD should better consider increasing cooling needs and promote efficient solutions on the building envelope as well as on equipment like reversible heat pumps, especially for buildings occupied by vulnerable people. It will bring additional benefits, such as air quality improvement, better health, new and high-skilled jobs. Deep renovation definition should be based on both energy consumption and GHG emissions components.
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
Please explain your answer:	A carbon component should be integrated to the mandatory minimum energy performance standards proposed by the EC, and could be positively introduce in the Building Renovation Passport. In each Member State the MEPS should cover a minimum percentage of buildings. A certain flexibily could be left to define the energy performance tresholds in each Member State. .
Question 12. What type of minimum energy performance standards do you consider most appropriate? Please specify:_10	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)
Please explain your answer:_11	The EPBD needs to include a carbon component to focus on the overall climate efficiency of buildings alongside their energy efficiency. It will contribute to supporting the switch to low-carbon, cost effective and efficient solutions. In addition, the EPBD also needs to set specific minimum performance standards of building elements; e.g. for the building envelope and/or technical building systems including heating and cooling.
Question 13. In your view, for which category of buildings should mandatory minimum energy performance standards be applied? Please specify subset of residential buildings:	All residential and non-residential buildings | Other (please specify in comment box)

Please specify subset of non-residential buildings: Other? Please specify:	The targets needs to be adapted to the type of buildings. The priority must be given to the most carbonated buildings, specially for the vulnerable customers.
Question 14. Do you think that mandatory minimum energy performance standards should be introduced:	Yes
If yes,_12	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:_13	Minimum Energy Performance Standards must integrate a carbon component. MEPS could be linked to specific moments in life of buildings (because it's practical), but not only, considering the differents buildings stocks.
Question 15. In your view, what are the most important elements that could guarantee a successful roll-out of mandatory minimum energy performance standards?	Other - please specify in comment box
Please specify:_14	Every answer is correct and important, but the most important could be : the correct identification of the worst performing buildings, both in term of energy and carbon efficiency.
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? Please specify:_15	Introduction of minimum energy performance standards in public buildings, with an obligation to achieve progressively more ambitious levels
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 toward	Yes
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Question 18. In your view, what kind of requirement would be needed? : The installation of recharging points to support smart charging, allowing to monitor, control and optimise energy usage when recharging electric vehicles	Yes
Question 18. In your view, what kind of requirement would be needed? : The inclusion of provisions for recharging points for vehicles other than cars (e.g. e-bikes)	Yes
Question 18. In your view, what kind of requirement would be needed? : 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)	Yes
Other measures? Please specify:	With regards to electric vehicles, the large majority of all recharging takes place at home or work. Failing to address charging in buildings would create a bottleneck for the future uptake of electro-mobility. The European Union and the Member States urgently need to create favourable conditions for charging infrastructure roll out in residential, workplace and public buildings, for both new and existing stock.
Question 19. Are you aware of administrative barriers preventing the deployment of charging points in buildings in your country?	Yes
If yes, please elaborate:	Along with an effective “right to plug” to EU citizen, stronger minimum requirements for the cabling (collective infrastructure) or pre-equipment of buildings would enable future EV users to connect at minimum cost and delay by only having to install a wallbox at their private parking spaces. This should at least be considered for new buildings or building undergoing major renovations. The EC needs to simplify procedures in order to avoid delays when installing a charging station, particularly in co-properties and SMEs. Scaling-up slow private charging is also particularly important because it’s also one of the best use-cases to perform smart charging, including V2X. The increased integration of renewables goes hand in hand with smart charging and makes the vehicle a resource of system flexibility, especially for the grid (V2G) and buildings (V2B).
Question 20. Do you agree that the framework for Energy Performance Certificates should be updated and their quality improved? Please specify:_16	Other - please specify in the comment box Energy Performance Certificates could be a powerful tool to also reduce GHG emission. To do that, Art. 11 must be revised in order to introduce the possibility to refer to final energy consumption alongside primary energy to be consistent with the Energy Efficiency Directive, and to be easily understood by customers (the final energy corresponds to his bill!). A carbon component needs to be integrated in the EPCs to also take into account the buildings’ GHG emissions.
Question 21. Is harmonization of EPCs needed to accelerate the increase of building performance and how can it be achieved? Other means? Please specify:	Yes, it is needed but some national specification should be retained - please specify in comment box

National specifications? Please specify:	Harmonisation of calculation methods are crucial in order to have a common base and framework to compare buildings performance bewteen E.U members, even if scale or threshold of EPC remains different. Moreover harmonisation and coherence of tools between SRI and Passeport renovation need to be developped in order to improve the visibility, simplify the process and massify the renovation in the future.
Please explain your choice: 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 : Improve t	2
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: Develop a 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	5
: Increase 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	5
: Increa5 Comment:_17	EPCs should also introduce a reference to final energy alongside primary energy consumption. Only final energy reflects the actual performance of the building envelope and the solutions and technologies installed inside. It is also consistent with the consumption measured by energy meters (and included in energy bills).
Question 23. Which elements are the most important to ensure compliance with EPC requirements?	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
Please specify:_18 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 t	Guidelines and best practice exchange on how the BRP can support the objectives of the Long Term Renovation Strategy | Training of energy experts | 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.
Other? Please specify:_19 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 int	Support the development of links between the SRI and other schemes (e.g. EPCs, building renovation passports, building logbooks, etc.)
Please specify:_20 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: buil	Yes
Please explain your answer:_21	Accessible, open and complete data from EU's EPC are crucial and a key prioirity to well knowledge and characterise the performance of the buildings stocks in U.E and the progress of decarbonation. These analyses should allow to facilitate the definition and update of decarbonation objectives and threshold most adapted to typologies and perfomance of buildings. Accessible and open database from others tools (as SRI, Passeport Renovation) would be interesting but it would be necessary before to ensure harmonisation of tools and coherence of database before (cf. question 21) in order to exploit them in fruitful and complete manner.
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 targe	4
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Other kind of support? Please specify:	Tenders to industrialize processes.
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?	Energy performance contracting (combined with an ambitious objective of GHG emission reduction) implemented by the public sector could be used to further support deeper renovation in Europe, and created a massification of the demand. In order to stimulate deeper renovations across the EU, public financial incentives should focus on cost-effectiveness. They should thus encourage the use of energy management solutions, such as EnPCs, which allow to guarantee real energy savings and dynamic energy performance overtime. In fact, the public financial incentives currently available often focus on a specific and single renovation work, while an effective way to stimulate deeper renovations would be to focus on the achievement and guarantee of a certain performance level. In general, it is of utmost importance to consider staged-deep renovation, which allows to take into account the savings achieved during the renovation period and to adapt to the evolving situation of the building.
Question 29. Do you think that funding support to renovations should be linked to the depth of renovation?	Yes
If yes,_22	The intensity of funding should depend on the depth of renovations based on the Energy Performance Certificates ('EPC') class achieved | Other - please specify in the comment box
If no,_23	
Please specify:_24	Funding support to renovations should be linked to the depth of renovation and to the household income, especially for low-income households.
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
Please specify:_25	
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 wo	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 | The Energy Poverty Observatory
Other legislative measures? Please specify:	
Other measures? Please specify:_26	
Question 32. Do you have any further comments on policy aspects relevant for the decarbonisation of building which are not covered above?	As the revision of the EED and thus of the Primary Energy Factor (PEF) will start before the revision of the EPBD, it is important to make sure that the role of PEF in both texts is that of a real enabler of decarbonisation rather than a barrier. PEF calculations in the EPBD should equally treat energy from RES generated on-site and RES supplied through an energy carrier. Investments and digitalisation should help to transform this sector in order to modernize it, to make it smarter and more efficient for customers and the environment. The Renovation Wave should guarantee an efficient use of funds to ensure more energy and GHG emission savings per euro invested. The renovation sector is strategic for the EU in terms of employment, industrial activity and decarbonisation. It is therefore a unique opportunity to create local high quality jobs and to stimulate the economy, especially in the framework of the European recovery plan.