

## GdW-Comments to the Inception Impact Assessment on Revision of the Energie Performance of Buildings Directive 2010/31/EU

22.03.2021

The housing industry needs a climate policy that can be carried out by sustainable housing companies and foster their ability to invest in their stock.

The intention of the following recommendations is to ensure that housing companies as portfolio managers are enabled to achieve increasing greenhouse gas reduction and that the successes are detectable in practice:

- **Mandatory Minimum Standards** must be economically feasible without extra funding. Otherwise, the feasibility of climate protection measures would be related to the availability of funding. This would be a hazardous path risking the continuity of the approach. Moreover, it would be the most expensive way. The goal of funding should be to finance the non-economic parts of highly efficient measures beyond the minimum standards.
- In particular, the funds made available by the EU do not reach the companies directly in the member states. EU-Funds are therefore not suitable for related requirements that are not economical.
- Mandatory Minimum Standards in Germany are so called conditional requirements. The condition is: if someone carries out a certain renovation measure on a building, the measures to save energy have to be economically justifiable to save GHG-emissions in the future. The design of the requirement is of great importance. If the requirements are too high, the renovation rate decreases instead of increasing.
- **Accompanying support policies** should be aimed at facilitating complex measures. This particularly applies to the combination of heat supply with local PV power generation and local CHP systems (for the electricity base load). In the area of climate protection measures, electricity generation is the only way for housing companies for a business activity. Housing companies are customers for all other climate protection measures e.g. thermal insulation, window replacement, renewal of heat generation.
- With regard to the **EPC**, it is of crucial importance to differentiate between an EPC in the event of a purchase, sale or planning of measures, energy advice on the one hand and an EPC for rental purposes on the other hand. Housing companies manage portfolios. Energetic renovation plans are based on energetic portfolio management. Investment decisions are combined with energy advices. It is not reasonable to require more detailed EPCs for rental purposes.
- Because of the management of portfolios, housing companies should definitely be given the opportunity to work with an energetic portfolio management or a portfolio strategy instead of **renovation passes** for individual buildings.
- **"Deep renovations"** needs large grants.
- **Our vision for buildings:** whenever possible, renovation should guarantee a future renewable energy supply, which means that heating must be possible with a low-temperature system, or 2050ready. We will not be successful if we call for maximum energy efficiency or maximum insulation. The marginal costs are too high, the marginal utility too low.