



Position Paper: Commission Draft Implementing Regulation on EPBD Data Templates

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German Business Association on Energy Efficiency (DENEFF)
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I. Introduction

The German Business Association for Energy Efficiency (DENEFF) welcomes the Commission's draft implementing regulation and annexes establishing common templates for transferring national building-performance data to the EU Building Stock Observatory (EUBSO). We would like to highlight the need to reduce additional red-tape burden. Therefore, we strongly recommend focusing on using existing data points and such which are crucial to enable investments and ease implementation and use for an effective governance and policy monitoring.

The regulation is seen as an essential pillar for making the Energy Performance of Buildings Directive (EPBD) operational: only if comparable, machine-readable and complete data is delivered, Europe can measure progress towards a highly-efficient, decarbonized building stock by 2050.

In that sense DENEFF fully supports the objective and the overall architecture of annual, anonymized country-level reporting that focuses on energy-, carbon- and renovation indicators drawn from Energy Performance Certificates (EPC), as well as real-performance data and data on and derived from heating-, ventilation- and air-conditioning inspections, Building-Renovation Passports and the Smart-Readiness Indicator.

However, when comparing the EU drafts, several gaps emerge that could limit future usefulness for policy-makers, financiers and local planners.

1. Unique Building Identifier (UBID).

The proposed templates contain only stock aggregates. However, EU-wide a harmonized UBID is vital for linking cadastral, subsidy or metered datasets and eliminating double counts. Therefore, the regulation should mandate member states to register (hashed) UBID column in national files; Brussels would still receive only aggregates but national data quality upstream would soar.

2. Metered energy and load data.

EPC figures are static. Real-life smart-meter and energy-management readings are crucial for grid planning and EU-Taxonomy risk. Thus, additionally insert mandatory-if-available-fields (miav) for metered annual final energy use (kWh /m² a) and peak demand (kW), starting with non-residential buildings with an effective rated output for heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation of over 70 kW from 2030.

3. Finance-relevant indicators.

DENEFF welcomes that renovation passport information shall be integrated (in GER called individual renovation roadmaps (iSFP)). Alongside estimated cost savings also include discounted cost savings (aligned to the currently being revised cost-effectiveness methodology) and simple "brown-discount" or Taxonomy-alignment scores, flagged mandatory-if-available so frontrunners lead.

4. Phased roadmap.

Fix two milestones: minimum dataset by 15 March 2027; extended dataset (metered data plus extra indicators) by 2030. The staged approach follows a "start with what exists, then enrich" principle and provides quick IT certainty.

5. Sub-national granularity.

Member states' legal means protect privacy yet tell municipalities little. Permit optional anonymized NUTS-3 (statistical region) or LAU (local unit) summaries once sample thresholds are met, enabling spatial heat planning.

6. Using existing data sources.

Issue guidance listing subsidy registers, building-permit files, 3-D models and micro-census statistics; encourage automated feeds via APIs so Member States need no costly new surveys.

7. Inspection alternatives (automation/ESCO).

The draft version requires in Art. 6 information about regular inspections. However, in the EPBD, Art. 23 (7) allows for exceptions from inspection requirements (Art. 23 (1)) for buildings which are equipped with building automation and control systems for certain non-residential buildings or monitoring and control systems for new and residential buildings undergoing major renovations according to Art. 13 (10 and 11). Art. 23 (5) allows for exemptions if an ESCO contract guarantees performance. Article 6 should therefore register these alternative compliance routes to measure their uptake and impact. Otherwise, the implementing act does not fully reflect the structure of the obligation introduced by the EPBD itself.

Finally, DENEFF highlights the importance of existing datasets: subsidy databases, building permits, micro-census and geospatial models. The Commission could add a guidance note listing such sources and encouraging automated feeds, accelerating database maturity without new reporting burdens.

II. Proposed Amendment Text

Draft Regulation

- Article 2 (new point 5) – *“Unique Building Identifier (UBID)’ means a persistent, nationally maintained code that unambiguously identifies an individual building or building unit; before transmission to the EU Building Stock Observatory such identifiers shall be irreversibly pseudonymised.”*
- Article 3(1) – append: *“Member States shall transmit the core dataset defined in Annex I by 15 March 2027 and, starting with the reporting year 2030, the extended dataset specified in Annex Ia.”*
- Article 4(3) – insert after first sentence: *“Aggregations shall, where technically feasible and without compromising anonymity, also be calculated for NUTS-3 or LAU territories and made available to competent local authorities.”*

Annex I / II

- Annex I – Energy Performance Certificates – in Tables 7 and 8 add columns *“Metered annual final energy use” (Miav) and “Peak load (kW)” (Miav)*. Footnote: **mandatory from reporting year 2030 for non-residential buildings with an effective rated output for heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation of over 70 kW*.*
- Annex I – Section 3 (HVAC Inspections), Table 18 – extend question 1: *“...Article 23(6) ... or equivalent measures such as certified building-automation systems or ESCO performance contracts (specify).” Add a new Miav column in Tables 19-21: “Alternative compliance – automation/ESCO”.*
- Annex II – Formulas – add §4: *“For metered values and peak load the same aggregation formulas (1)–(3) apply.”*

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