



Council of the European Union  
General Secretariat

**Brussels, 23 October 2017**

**WK 11842/2017 INIT**

**LIMITE**

**ENER**

**WORKING PAPER**

**CONTRIBUTION**

---

From: General Secretariat of the Council  
To: Delegations  
Subject: DE comments on the revised Energy Performance of Buildings Directive

---

Delegations will find in the annex the DE comments on the revised EPBD proposal.

# **Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2010/31/EU on the energy performance of buildings**

**German comments on the Presidency's first assessment of the principles of EP amendments in preparation for the first trilogue – 12964/17 – (general scrutiny reservation)**

**20<sup>th</sup> Oct 2017**

**1. GER supports the PRES position.**

**2. Main points for GER are:**

## Art. 2a

Regarding the long-term renovation strategies, GER believes a well-balanced compromise has been found, which – to the extent possible – ought not to be extended.

## Art. 8

Like PRES, GER considers the amendments not acceptable. Para. 4b should be rejected, in particular.

## Art. 10

- GER stands by the Council's proposal at this point: financial measures for energy efficiency improvements will have to be based on general assumptions to some extent and should not be linked strictly to the energy savings resulting from such renovation.
- Regarding Art. 10 para. 6a, GER emphasizes the PRES position that any wording which may indicate the need for a new database is not acceptable.

## Art. 14 para. 2 a and Art. 15 para. 2 a

Maintaining the measures set out in Art. 14/15 para. 2a is a crucial issue for GER. Calls for their deletion should be rejected.

## Annex I

No amendments should be considered either in no. 1 or in no. 2.

- No. 1: The proposed harmonization under mandate M/480 should be rejected. Appropriate implementation would not be feasible in GER.
- No. 2: The possibility to treat on-site and off-site renewables differently is of high priority for GER.