



Shaping a valuable Smart Readiness Indicator

smartEn contribution to the European Commission's consultation on
the draft Implementing and Delegated Regulations

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14 July 2020

smartEn supports the ongoing efforts to define a valuable Smart Readiness Indicator (SRI) for buildings, to be deployed across Europe.

We appreciate that the timeline for the adoption of the Implementing and Delegated Regulations has not been postponed, even in these unprecedented circumstances, and look forward to the deployment of the SRI from September 2020.

However, we regret that no Member States has confirmed yet adoption of the SRI at national level.

smartEn welcomes that the **draft Implementing Regulation** further details the principles set in the revised EPBD and recommends taking into account the following suggestions:

- Art. 3 - As demand-side flexibility is one of the three smart readiness functionalities to be assessed in the SRI, experts accredited and qualified to issue SRI certificates should have a recognised knowledge of the capabilities and requirements of smart and active buildings. We doubt that experts accredited or qualified for issuing Energy Performance Certificates (EPC), or for carrying out inspection of heating, air-conditioning, combined heating or air-conditioning and ventilation systems, have also the skills and competences to assess demand-side flexibility functionalities. In this light, Member States should set specific requirements and dedicated trainings for those experts willing to qualify for issuing SRI certificates,
- Art. 5 - Although the voluntary nature of the SRI does not impose any mandatory deployment, we encourage Member States that opt for its uptake to couple it in a mandatory way with the issuing of EPCs and to the BACS deployment trigger points in accordance with Articles 14 & 15 of the EPBD,
- Art. 6 - Also information on online self-assessments should be collected and monitored by national and European authorities, beyond information on SRI certificates issued by a qualified or accredited expert,
- Art. 7 – SRI certificates should be integrated in a set of regulatory and financial incentives in Member States that opt for its deployment in order to guide and monitor progress in building renovation. In this light, Member States shall establish dedicated measures to support the uptake of the SRI scheme in the context of the long-term renovation strategies, as well as the Renovation Wave and the national recovery plans,
- Art. 8 - The SRI needs to get tested to become sufficiently relevant for all relevant parties and for the clean energy transition. Testing of the SRI is important to get all different stakeholders acquainted with this new scheme and methodology. However, the testing phase should not postpone further the structural deployment of the SRI. smartEn welcomes the reduction of this testing phase to 6 months or 1 year at the latest. smartEn supports the requirement to concerned Member States to submit a report on the related feedback to the Commission. This might lead to suggestions on how to improve the SRI implementation, including simplifications and recommendations on how to complement the SRI with existing tools as EPC to increase its value,
- Annex – Monitoring of the SRI implementation is key for a proper assessment of the expected “push and pull” impacts. However, it should not be limited to the issued SRI certificates, but cover also online self-assessments.
While all data listed in the Annex is relevant for an accurate monitoring, key are the smart readiness scores for the three smart readiness functionalities. Such data should be

aggregated at national level as well as at European level.

Also the European Commission should be subject to an annual reporting obligation, relying on data collected by Member States, to be made available to all EU institutions and a dedicated “SRI Platform” involving all relevant interested parties, including stakeholder associations and consumer organisations (to be introduced in the Delegated Regulation).

smartEn welcomes the **draft Delegated Regulation** and recommends taking into account the following suggestions:

- Art. 3 - Increased digitisation and connectivity in buildings increases cybersecurity risks and makes buildings and their systems more vulnerable to cyber threats. The SRI should help to inform building owners and users of those risks in general terms as well as the specific level of these risk in a building. In fact, a general warning on cybersecurity, if not complemented by a building specific evaluation, could hamper the attractiveness of innovative solutions. A description of the integrated cybersecurity measures could invoke trust.
- Art. 6 – In order to simplify adoption, decrease confusion among stakeholders and end-users, and streamline links with EPCs and other certificates, each Member State that opts to implement the SRI scheme should:
 - only choose to apply it on a mandatory basis, and not also on a voluntary basis, for buildings or building units located on the territory of that Member State,
 - adopt the common methodology defined at European level and outlined in Annexes I-IX to avoid unnecessary fragmentations and multiplications of similar SRI schemes across Europe. Modifications, adaptations and evolutions should be discussed and revised at European level, involving the “SRI Platform”.
- NEW art. 10 – The draft Delegated Regulation presented by the Commission in December 2019 introduced a “SRI Platform” involving all relevant interested parties, such as Member States’ administrations, competent bodies, stakeholder associations of the buildings sector and consumer organisations. At the last stakeholders’ consultation meeting, all parties welcomed this proposal. smartEn recommends reintroducing this provision in the Delegated Regulation to establish a “SRI Platform” to:
 - contribute to the promotion of the SRI scheme in the EU,
 - provide the Commission and Member States with advice and assistance on the implementation of the SRI scheme, notably on formation modules and trainings for accredited experts to issue reliable SRI certificates,
 - issue recommendations on possible evolutions of the methodological framework for calculating the SRI.