



To the kind attention of **Kadri Simson, Energy Commissioner**  
CC: Deputy Permanent Representatives of the EU27 Member States  
Stefan Moser, Head of Unit, European Commission

**Re: Consistency in the implementation of the SRI at national level**

Brussels, 6 May 2021

Dear Commissioner,

the introduction of the Smart Readiness Indicator (SRI) is a key milestone in the EU strategy to make the building stock future-proof. The signatories of this letter welcome the publication, in December 2020, of the implementing and delegated regulations, to set both the technical framework and all necessary steps to implement the long-awaited common scheme developed at EU level. With this letter, we would like to call the European Commission and the Member States to act immediately to ensure effective, ambitious and consistent implementation of the approved SRI scheme across the EU and avoid a multiplication of local incomparable schemes.

Harmonisation is key to avoid repeating the mistakes of the Energy Performance Certificates which led to a fragmentation of the EU market, created barriers for the free circulation of services (e.g. experts must be accredited in each Member State) and additional costs and administrative burden to the industry (which at the end have to be supported by EU citizens).

We understand that this is the aim of the upcoming support contract to provide “Technical assistance for testing and implementation of the SRI under the EPBD”. However, we are concerned that this effort comes too late as some Member States are already taking steps to adopt local versions and, without the technical assistance being in place, the risk of divergence is great.

We have strong concerns that national SRI schemes might differ substantially in the weighting of impact criteria in key functionalities and/or smart-ready service catalogues, which could produce incompatible national implementations.

In light of the above-mentioned reasons, we:

- encourage Member States to deploy the SRI and align to the common methodology approved at the EU level as much as possible, with the same qualification of experts to build a harmonised tool and related training scheme across the EU. This would enable and facilitate analysis and comparison of the readiness level in different Member States and regions providing the basics for an inclusive and streamlined updating process,
- call the European Commission to monitor the implementation without hesitation and to put in place all measures to ensure consistency and avoid fragmentation in their bilateral exchanges with the Member States and also consider issuing recommendations, when necessary.

Although shaped under the Clean Energy for All Europeans package, the SRI should serve towards the achievement of the EU Green Deal goals, and especially the Renovation Wave initiative and the Energy System Integration Strategy.

We firmly believe that the SRI has an important role to play in making our European buildings healthy, efficient and smart, and urge for the consistent, broad and fast uptake of SRI to speed-up this transition.

Yours sincerely,

*Electric Underfloor Heating Alliance (EUHA)*

*EPB Center*

*European Building Automation and Controls Association (eu.bac)*

*European Committee of Electrical Installation Equipment Manufacturers (CECAPI)*

*European Coordinating Committee of Manufacturers of Electrical Switchgear and Controlgear (CAPIEL)*

*European Copper Institute*

*European Lift Association (ELA)*

*European Partnership for Energy and the Environment (EPEE)*

*European Smart Energy Solution Providers (ESMIG)*

*GCP Europe - European association for building engineering services*

*LightingEurope*

*smartEn – Smart Energy Europe*