
Brussels, January 08, 2015

Dear Paul Hodson,

On behalf of the European Public Real Estate Association (EPRA), I am writing to provide some general comments on the discussion on the EU Common Certification Scheme (EVS).

EPRA's view is that in order to define an effective EVS, it is necessary to consider basic operational constraints. As illustrative examples, there is no simple and shared definition of the measurement of a square meter in Europe (m²), energy data is scattered among different users, and there are restrictions in the ability to collect energy data linked to privacy laws, amongst other issues. To understand these constraints, EPRA suggests a consultation period with the owners and actual operators of buildings directly to fully understand the technicalities and difficulties in collecting such data.

Notwithstanding this, it is EPRA's view, as a representative body of the listed real estate industry, that in order to be effective and meaningful, an EVS should be:

- cheap to be implemented: this avoids the need to divert financial resources that could be otherwise used to actually improve the energy performance of the building;
- easy to read and understand for a non-real-estate professional;
- transparent: Data about all EVS need to be widely shared and accessible online by all stakeholders, enabling the ability to benchmark and identify trends;
- dynamic: not only look at the data at a given date, but also look at the data over time in order to show trends of energy consumption in a building;
- comprehensive: an EVS should show both energy and emissions (e.g. for the same level of consumption, emissions are lower if you use cleaner energy);
- be based on actual data: an EVS has to be based on actual consumption and to consider the actual occupation and use of a building. A simple measure of m² is not sufficiently clear or reflective of real-world use.

We hope to have provided a meaningful contribution to your work to support the development of a sound regulatory framework. Please consider EPRA's team at your disposal should you have any specific questions about the listed real estate sector.

Kind regards,

Philip Charls
EPRA CEO

About EPRA

EPRA is the voice of the publicly traded European real estate sector: it is the representative association for commercial property companies that are quoted on the public stock exchanges of Europe and other exchanges around the world. With more than 200 active members, EPRA represents over EUR 350 billion of real estate. EPRA's membership also includes the institutional investors such as pension funds and insurance companies that invest in, or have an interest in investing in real estate indirectly via these listed property companies. Through the provision of better information to investors, improvement of the general operating environment, diffusion of best practices and the cohesion and strengthening of the industry, EPRA works to encourage greater investment in listed real estate companies in Europe with long-term and stable income producing assets.

