



Ympäristöministeriö
Miljöministeriet
Ministry of the Environment

Date
27th of May 2014

Günther Oettinger
European Commissioner for Energy
B - 1049 Brussels (Belgium)

Dear Mr. Oettinger,

Finland has implemented the Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the Energy Performance of Buildings (recast). As a Minister of Housing of Finland I have been informed about the regrettable issues raised by significant amount of Finnish citizens concerning the need of energy performance certificate for old one-family houses. Because of that I wish to launch an initiative to include EPBD in the Regulatory Fitness and Performance Programme (REFIT). The directive should be regenerated since there is room for simplification and the unnecessary regulatory burden should be reduced.

In Finland there are 1,1 million one-family houses and approximately 5,4 million inhabitants. Half of our inhabitants wish to live in one-family house. This creates unequal treatment of the majority of the families in a situation the family needs to sell or rent their home. It is much more economical to acquire an energy performance certificate for an apartment house and divide the cost than have an energy performance certificate for each and individual one-family house.

Implementing of the revised EPBD by renewing our legislation concerning energy performance directive has created a citizens' initiative with 60 000 signatures. The aim of the initiative is to amend the legislation pertaining the content of energy performance certificate for old one-family houses. The Parliament of Finland is currently processing the initiative.

In my opinion the EPBD should be revised in a manner that the need for energy performance certificate would be voluntary for existing one-family houses that have been built before the EPBD. This would create an opportunity for the simplification of the legislation and take better into account different circumstances throughout Europe. At least in Finland it appears that families would definitely be more willing to improve the energy efficiency of their houses basing on a voluntary certificate. Mandatory nature of the current legislation is seen as too detailed and not flexible enough to take into account different tasks of property management. The mandatory nature of energy performance is actually causing reluctance to receive intended positive impacts of the directive.

As a result EPBD would fit perfectly in the scope of the REFIT. The aim of the EPBD is not completely met efficiently and effectively. Voluntary nature of energy performance certificates for those old one-family houses would decrease regulatory burden and simplify legislation. Therefore the Commission could easily propose revising EPBD to Council and Parliament.

Pia Viitanen

Minister of Culture and Housing