

Consideration of the lack of harmonisation of EPC methods across Europe

The recast should have greater consideration of the lack of harmonisation of EPC methods across Europe. As documented by crossCert [here](#), significant differences exist between calculation and assessment approaches across different European countries. As well as questioning the equivalence of energy rating bands between countries, this also raises the likelihood that EPC innovations such as Building Renovation Passports, SRI, and Operational Energy Ratings, will function in a different way when placed within these different methodologies. Field trials and testing of some of these innovations are currently underway in some countries, which is welcome, but diversity of EPC approach (and its consequences) could be more explicitly addressed.