

## **Revision of the Energy Performance of Buildings Directive 2010/31/EU via Directive (EU) 2018/844 – Public Consultation Phase**

Considering that the structural integrity of buildings often dictates their lifetime and thus has a significant impact on energy renovations, we recommend the addition of the below reference in Article 2a.7 of the revised EPBD, so that a holistic approach is taken for the upgrading of the energy efficiency of the aging building stock of EU countries prone to earthquakes, one that incorporates the assessment and upgrading of their seismic capacity where necessary.

*“For buildings located within regions of high seismicity that have been designed without the implementation of a seismic code and shall undergo major energy renovations, the seismic capacity of the building should be assessed by a competent engineer. In the case that structural upgrades are deemed as necessary for the safety of the building following the assessment of its seismic capacity, the structural/seismic upgrading of the building should take place simultaneously or prior to energy renovation works.”.*