

**To European Commission DG GROW Construction**

## **Comments on the Draft standardization request on Digital Building Logbooks (DBL)**

### **General comments on the standardization request**

*Finnish Property Owners Rakli (Transparency Register id 727236253172-92) is association of Finland's most prominent owners of residential and commercial properties and infrastructure, property investors, largest cities in Finland, as well as construction clients. Our members include both private and public sector entities.*

Finnish Property Owners Rakli welcomes the opportunity to provide insights on the on the Draft standardization request on Digital Building Logbooks. We support harmonization initiatives of real estate data for a better functioning real estate market and to enhance innovation and productivity of the building and real estate sector.

As a voluntary framework and properly designed the digital building logbook may well support information management and transparency of the real estate markets across EU.

For DBL standard to be workable, suitable for different markets, and broadly accepted by property owners, it is essential that a few fundamental safeguards are clearly embedded already at the level of the standardization request. Greater clarity is required regarding voluntariness, data ownership, scope limitation, protection of commercially sensitive information, adaptability to different markets, and respect for privacy.

For the markets to really accept the DBL standard, the standard should remain voluntary in practice, not only in principle. Experience from other policy areas demonstrates a real risk that voluntary standards are later rendered de facto mandatory through national legislation, administrative practice, supervisory expectations or indirect regulatory references. In these cases, the suitability of the standard or EU instruments for different member states also becomes very important and, in many cases, this has not been achieved. This is particularly relevant in the case of DBL because of interaction between Digital Building Logbooks and other explicitly voluntary EU instruments, notably the Smart Readiness Indicator (SRI) and the Building Renovation Passport (BRP) under the Energy Performance of Buildings Directive (EPBD). SRI and BRP are designed as voluntary support tools, intended to assist building owners in assessing options and planning investments. They are not regulatory compliance

instruments and were never intended to become mandatory requirements and for example the suitability of SRI to Finnish energy and real estate market is not ideal.

Therefore, we emphasize that DBL standards must not be used, directly or indirectly, as a legal or technical basis to require the uptake, assessment, reporting or regular updating of SRI or BRP.

### **Problematic data content specifications of the standardization draft**

Rakli supports the statement in Annex II, Part A, that the building owner is the principal owner of the information contained in the digital building logbook. This principle is fundamental and must be consistently reflected throughout the entire standardization framework, including the specific requirements in Annex II, Part B.

The data requirements included in the DBL should respect the following principles:

- **Avoiding open-ended and expandable data requirements**
  - Several provisions in Annex II, Part B rely on formulations such as “including but not limited to” and allow for the addition of “other key performance indicators”. From a property owner perspective, such open-ended wording is problematic, as it creates uncertainty regarding the actual scope and future expansion of data requirements especially because the data requirement examples in Annex II include commercially sensitive information. Standards must not allow for the unilateral or incremental expansion of required data content without a formal revision process and proper stakeholder involvement.
- **Protection of commercially sensitive and contractual information**
  - Certain data categories listed in Annex II, Part B are unsuitable for inclusion in a standardized DBL framework. These data categories include:
    - Tenancy agreements and related contractual documentation, which are protected by contract law, confidentiality obligations and commercial considerations; and
    - Financial and valuation-related information, including operational costs, property values, taxation data and investment figures, which constitute sensitive business information.
- **Privacy and data protection**
  - While the draft appropriately refers to compliance with the GDPR, several proposed data categories — including information on occupants, user profiles and detailed consumption data — raise significant concerns in terms of privacy and proportionality.

The standards should therefore strictly apply the principle of data minimization and clearly distinguish between technical building data and data that may relate to identifiable individuals.

- **Suitability for different markets**

- The information content of standardization must be designed so that it supports essential information content in all EU markets, not just in certain sub-markets. National market conditions must be taken into account. If information is not suitable for use in the entire EU market, it should not be used in the standard. For example, the section “2.1.2.4. Building operation and use” lists the information “renewable energy production” along with other information. The renewable energy production of the building may be essential information in part or many parts of the European market, but in the Nordic context, for instance, almost all energy purchased from the grid is emission-free and it is generally unnecessary to maximize the on-site renewable energy production. Rather, statistics show that on-site renewable energy has a larger life-cycle carbon footprint than the energy purchased from the grid. In this context, information on the use of emission-free energy in the building would be more useful.

## **Conclusion**

At the moment, the data requirements and the wording of the text in the standardization draft do not support the principles highlighted above. It is utmost important that data that does not support the above-mentioned principles to be removed from the standardization draft and the standardization draft to be modified accordingly.

It is essential to maintain a clear boundary between voluntary standardization to support the EU markets and regulatory obligations. DBL standards should facilitate interoperability and technical alignment but must not function as a first step for new regulatory requirements, reporting obligations or compliance mechanisms

### **Additional information:**

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