

Position

BDI position on the draft of the Energy Performance of Buildings Directive (EPBD) 15.12.2021

Federation of German Industries e.V.

Date: 25.03.2022

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1. Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the energy performance of buildings (recast)

The European building stock is in urgent need of a renovation wave and a green and digital transformation to achieve its climate goals. The energy consumption of existing buildings must be significantly reduced through comprehensive retrofitting of the building envelope (roof, windows and façade), optimisation of building operation and comprehensive renewal of heating equipment, use of renewable energies and building automation and monitoring as well as other digital tools supporting the user in a responsible energy consumption. For the most part, all this can only be done gradually. The technologies to achieve the goal of a ‘climate-neutral building stock by 2045 in Germany and 2050 in Europe’ are already available and the technological developments will be an additional driver. The EPBD has to provide the legal framework to achieve these ambitious goals.

Article 2 Definitions

The BDI welcomes the clarifications through new and more defined definitions, e. g. for minimum energy performance standards, deep and staged renovation etc., which will help Member States with the implementation of this directive.

Zero-Emission Buildings (ZEB)

With respect to zero-emission buildings, the definition should be critically reviewed, as the application of the new standard for the existing stock is questionable from an economic and technical point of view. Furthermore, the social dimension needs to be assessed as well.

For more details please see comments on Annex III (p. 12).

Article 3 National building renovation plan

The BDI welcomes the introduction of comparable national building renovation plans for Member States in connection with Annex II. A uniform roadmap approach with a variety of mandatory and optional indicators is helpful to reach the respective climate goals and to measure the impacts of different actions. However, the implemented and planned policies and actions currently underrate important low-investment and quickly implementable measures, which can play a decisive role in reducing CO₂-emissions and enable us to stretch the remaining CO₂ budget.

The introduction of a 5-year period for the submission of the plan in Article 7(2) is reasonable and stronger monitoring of Member States by the European Commission is welcomed. A 3-year period appears even more suitable due

to the very ambitious 2030 target and the otherwise significant risk of not getting on the right track to meet these targets early enough.

While the individual building needs to remain in the focus of policy instruments, regulation should additionally provide fulfilment options for districts or neighbourhoods, wherever reasonable and feasible.

Moreover, bureaucratic procedures must be lean and efficient. Rather than slowing down the process they should be supplementary in evaluating the progress of national renovation and energy efficiency efforts to increase renovation and energy efficiency in buildings.

- Recommendation: Add the following point to the mandatory indicator on policies and measures:

(p) the promotion of low investment measures, including devices to measure minimum efficiency standards for heating systems

Article 5 Setting of minimum energy performance requirements

The BDI welcomes that performance requirements will continue to be based on cost optimal levels and so the economic efficiency principle applies.

Article 6 Calculation of cost-optimal levels of minimum energy performance requirements

We do not consider delegated acts as the appropriate instrument to secure technical innovations, as the process is unable to take into account new technical developments at needed pace. For example, synergies between buildings within a district or neighbourhood, between old and innovative technologies or even between different sectors would risk being excluded by a focus on individual reference buildings.

With this in mind, political, economic and technical instruments of regulation should be structured more clearly towards their respective goals. In this case, the Commission should create a mandate for technical norms to be developed by the European Standardization Organisation.

Article 7 New buildings

The exemplary role of the public sector in Article 7(1a) EBPD is welcomed. Where new buildings are necessary, the public sector has a role model function for energy efficiency and a sustainable use of regional, building materials made from renewable raw materials as much as possible. Nevertheless, it has to be ensured that public authorities, especially on local level, are able to reach this goal which means in practise additional financial funds. The BDI approves further the Europe-wide introduction of life-cycle Global Warming Potential (GWP) in Article 7(2) EPBD for large buildings.

As the introduction of the life cycle GWP indicator for one- and two-family-houses and smaller apartment buildings would probably result in rising planning and therefore building costs, we call on the Commission to assess these cost increases in advance.

Before this additional indicator is required for small buildings, too, the cost impact has to be assessed. In addition, there should be no obligations for citizens and businesses derived from this indicator for the foreseeable future.

Moreover, any future implementation of grey energy into the EPBD needs to take into consideration the differences between processes and recipients, in order to separately address these different mechanisms.

- Recommendation: Assess and evaluate the planning cost increases linked to the life cycle GWP indicator for buildings and its likely impact on building costs, before a decision for a general introduction in 2030. To simplify the process linked to the GWP, Building Information Modelling (BIM) could be a useful tool.

Article 8 Existing buildings

Ensure that Annex III (Zero-emission buildings) is applied appropriate for existing buildings

The BDI welcomes, that the requirements for existing buildings continue to be based on the economic efficiency principle and the cost optimal level, as described in Article 5.

However, the reference in Annex III to renovated buildings in combination with the challenging new building requirements is misleading. Setting these minimum requirements for existing building is from an economical and technical view undesirable.

Therefore, the threshold figures lined out in Annex III should from the BDI's perspective characterize the standard for new buildings. A renovated building can even with appropriate financial support through subsidies hardly achieve this efficiency level. In addition, none of the current German studies on climate protection describes a need for the average of refurbished buildings to meet the same standard as future new buildings. Thus, a clarification is needed so that linked legislation (for example the EU Taxonomy) or finance schemes do not refer to this figure as an achievable standard in the near future for existing buildings or buildings that undergo renovation.

Moreover, the directive should better promote combining renovation work in existing buildings with measures to improve user behaviour. Also measures to improve information on consumption behaviour and equipment, e. g. a monitoring of the efficiency of heating systems, need to be further strengthened in the directive.

- Recommendation: Clarify that zero-emission buildings characterise the standard for new buildings only.
- Recommendation: Better promote measures to improve information on consumption behaviour and equipment in combination with renovation works in existing buildings.

Article 9 Minimum energy performance standards

Create economic feasible MEPS

Public support for energy efficiency measures on buildings is a precious commodity. Private homeowners and businesses need to be convinced in the first place. In the recent BDI study ‘Climate paths 2.0’ the assessor from the Boston Consulting Group proposes minimum energy performance standards as a matter of last resort with a lead time of 5 years if sectoral climate targets are not met.¹ Assuming that the national implementation will as well take time and, as addressed earlier, owners will compete for resources (planning and skilled labour capacities etc.) simultaneously, the deadlines set for 2027 seem too ambitious. The potential lock-in effects linked to these problems could lead to small scale improvements, i. e. enhancement of 1-2 energy classes, and not to the urgent needed deep renovations. Furthermore, we should take into consideration that most Member States will require significant support and a few years of time to raise the number of skilled workers in the building sector.

Thus, the BDI welcomes that minimum energy performance standards are restricted to worst-performing buildings, meaning that class² F and later class E will become the minimum standard. These standards should be implemented as economically feasible minimum requirements linked with a sufficient lead time and an appropriate subsidy scheme for renovation measures, especially the ones incentivising staged and deep renovations.

The non-residential sector should also be differentiated here according to asset classes – a hotel, hospital or logistics property differ too much for a ‘one size fits all’ approach. Here, the Commission should make a more precise subdivision.

Before an introduction of minimum energy performance standards is considered for other classes, the already existing toolbox with its various instruments needs to be optimised to achieve the goal. An example are low investment measures, including devices to measure minimum efficiency standards for heating systems, as a cost-effective and quickly implementable bridging instrument.

¹ Boston Consulting Group (2021): CLIMATE PATHS 2.0t, October 2021, p. 38, Link: <https://web-assets.bcg.com/02/a6/91958a6f4287a0490e24ef56d2b5/climate-paths2-summary-offindings-en.pdf>

² In Germany the energy classes are applied from A+ (0-30 kWh/m²) to H (>250 kWh/m²). Assuming a not harmonized European scale, it would move from H to G and from G to F. Link: https://www.gesetze-im-internet.de/geg/anlage_10.html

- Recommendation: Implement minimum energy performance standards for the classes³ F and G as economically feasible minimum requirements linked with a long lead-time and a subsidy scheme for renovation measures, avoiding lock-in effects and incentivising staged and deep renovations.
- Recommendation: Introduce a subdivision for non-residential buildings.

Promote what is required by regulatory law

For residential buildings, stricter framework conditions will apply from 2030 onwards. Here, the draft EPBD provides transition periods or funding instruments, which are the sole responsibility of the Member States. This assumes, however, that national budgetary law must be changed to the effect that funding can also be provided for what is mandated by regulatory law. Such legal adjustments would have to be made throughout Europe.

Article 10 Renovation passport

Introduce mandatory renovation passports with subsidies for every building

The introduction of the renovation passport is welcomed by the BDI as an adequate tool to empower European citizens and businesses. Citizens and businesses need information on how to reach their individual efficiency goal. A renovation roadmap linked with targeted renovation subsidies is therefore an adequate empowerment tool. The aim must be to upgrade existing buildings in a holistic manner that is open to all technologies.

The energy consumption of existing buildings must be significantly reduced through comprehensive retrofitting of the building envelope, optimisation of building operation, comprehensive renewal of heating equipment, renewable energies, building automation and monitoring as well as other digital tools supporting the user in a responsible energy consumption.

Buildings must be assessed as systems and addressed in a holistic way, including all potential synergies of technical and other measures throughout their life-cycle. For the most part, this can only be done gradually. The technologies to achieve the goal of a ‘climate-neutral building stock by 2045 in Germany and 2050 in Europe’ are already available and the technological developments will be an additional driver. Furthermore, individual measures need to be accounted for as part of larger measures (district/neighbourhood or portfolio approaches), thus encouraging larger size projects and scale effects.

³ See footnote above.

For non-residential buildings a renovation passport is necessary as well, which is much more complex with respect to building services, illumination, occupant, air frequencies etc.

- Recommendation: Introduce mandatory renovation passports for every building in the European Union between 2023 and 2028 starting with worst performing buildings. This renovation passport including a renovation roadmap should be free of charge or be subsidised.

However, the Commission should also take into account, that mandatory renovation passports are not purposeful for nearly zero energy buildings or zero-emission buildings and should therefore exempt these buildings. Germany has already established a suitable renovation passport scheme which could be used as a basis for a uniform European version.

Article 11 Technical building systems

Technical equipment must be planned in the context of the building as a holistic system.

To use technical building equipment installations as efficiently as possible throughout their entire life cycle, regular monitoring and optimisation of the equipment and the electrical installation in the building should be made mandatory in paragraph 1.

Moreover, instead of indoor air quality, monitoring and regulation of indoor climate quality should be used as a term.

Article 12 Infrastructure for sustainable mobility

The expansion of charging infrastructure in residential and non-residential buildings is generally welcomed by the BDI. Thus, energy efficiency and renovation measures which enable the existing building stock to update its corresponding infrastructure for electro mobility are necessary.

The BDI welcomes further measures which remove unnecessary obstacles for the construction of charging infrastructure including (1) the simplification of subsidies and referring application proposals, (2) the acceleration of public approval procedures for grid operators and (3) the simplification of process for the installation of house connections.

Article 13 Smart readiness of buildings

SRI for buildings with effective output over 290 kW

The introduction of the Smart Readiness Indicator for non-residential buildings with an effective rated output for heating systems, or systems for combined space heating and ventilation of over 290 kW is welcomed by the BDI, but digitalisation must not be limited to non-residential buildings. Therefore, an application of the SRI in residential buildings in a non-mandatory manner can be beneficial.

Article 14 Data exchange

Use of consumption and measurement data

The BDI welcomes that exchange of data is allowed for the first time, but this does not automatically allow the beneficial use of data, for example, for building automation and energy services. It should therefore be explicitly made possible to use it for this purpose. The German Federal Commissioner of Data Protection and Freedom of Information argues that anonymisation also constitutes data processing and therefore always requires a legal basis for authorisation. Without an explicit legal basis, the use of the data in Germany would therefore not be possible. Also, data ownership rights need to be further clarified with respect to companies' and software providers' rights.

➤ Add bullet point No. 6:

'6. The processing of consumption and measurement data for building automation and energy services is allowed.'

In addition, it should be safeguarded that in case of mandatory data disclosure the data providing party is able to charge a cost-covering fee.

➤ Recommendation: Adapt bullet point No. 3:

'~~3. No additional costs shall be charged~~ **The company which gathered the data is allowed to charge a cost-covering fee** to the building owner, tenant or manager ~~for access to their data or~~ for a request to make their data available to a third party. [...]'

Article 15 Financial incentives and market barriers

Establish a Europe-wide information campaign and counselling services for energy efficiency

The BDI approves the suggestions made by the European Commission with respect to financing and support measures but misses the establishment of an information campaign and counselling services for energy efficiency. European citizens and businesses need to be informed and to be convinced of the necessity of energy efficiency measures.

Suitable key figures need to be developed for every existing building. So that, citizens and business are able to understand their individual contribution to a climate neutral future.

➤ Add bullet point:

‘Member States shall conduct information campaigns on energy efficiency in buildings and provide adequate counselling services regarding energy efficiency measures and linked national and European subsidy schemes.’

Information measures accompanying financial measures for energy performance improvements

It is a common phenomenon that in apparent amount of buildings that have undergone major renovation, energy savings fall short of expectations. One reason for this is the rebound effect, which describes that consumers in renovated houses may heat more rooms or to higher temperatures than before or may not turn down the heating during window ventilation, thus cancelling out a significant part of the theoretical CO₂ savings. This needs to be countered with improved consumer information in the form of data. Smart building systems are even able to avoid or at least reduce this effect. In addition, energy consumption before and after renovation, calculated and recorded for instance in a renovation passport, should become one of the most important indicators for linking financial measures to energy efficiency improvements.

Blue card for qualified construction workers

Measures taken by the European Commission in Article 15 EPBD and linked legislation in the recasted EED and amended RED are not going far enough to solve the lack of skilled labour. Deadlines need to be accompanied by the built up of a qualified workforce, meaning craftsmen and independent energy experts. Otherwise, labour shortages are pre-programmed, and the climate goal is set to fail. The introduction of minimum energy performance standards will even tighten this scarcity further. A coordinated European approach, like the Pact for Skills announced in the Renovation Wave communication is urgently needed.⁴

The Boston Consulting Group assumes that the renovation rate in Germany has to rise from around 1.1 percent per year to around 1.9 percent in 2030 and to 2.1 percent in 2045⁵ so that the climate target in the building sector can be reached.⁶ A recent study of the Karlsruhe Institute of Technology

⁴ European Commission (2020): A Renovation Wave for Europe, p. 6, October 2020, Link: https://ec.europa.eu/energy/sites/ener/files/eu_renovation_wave_strategy.pdf

⁵ The German Government wants to reach climate neutrality in 2045 and increased therefore the target in 2021 from 2050 to 2045.

⁶ Boston Consulting Group (2021): CLIMATE PATHS 2.0, October 2021, p. 11, Link: <https://web-assets.bcg.com/02/a6/91958a6f4287a0490e24ef56d2b5/climate-paths2-summary-offindings-en.pdf>

(KIT) demonstrated for Germany that this means 350,000 additional construction workers, doubling the figure to 700,000.⁷ By 2035, the number of people employed in Germany is expected to decline further by approx. ten percent and the situation will worsen even further. The EU's largest economy is heading for a major problem.⁸ As this point is not addressed adequately in the EPBD and linked legislation, it could topple the whole endeavour.

- Recommendation: The European Commission, Member States and the European Parliament shall amend the EPBD as well as European and national legislation linked to the Council Directive 2009/50/EC of 25 May 2009 on the conditions of entry and residence of third-country nationals for the purposes of highly qualified employment so that further market barriers for qualified construction workers are removed.

Introduce serial and modular building subsidies and improve building renovation subsidies

A combined bonus for multiple measures, improving energy efficiency and reducing greenhouse gas emissions, should be granted to foster technologies that support CO₂ reductions, installations of renewable energy storage, renovations etc. in individual buildings. Existing subsidies should be connected and expanded to encourage faster, more comprehensive energy efficiency and renovation measures and energy carrier changes including a combined bonus for multiple energy efficiency or renovation measures, an early-bird bonus could also be a further incentive.⁹

- Add bullet point:

‘Member States shall introduce modular building subsidies and improve building subsidies, addressing combinations of energy efficiency and renovation measures.’

Implement tax breaks

Renovations have usually a long tax amortisation period, which can hamper investments in energy efficiency. EPC's should be closely linked or integrated with renovation passports. This could be improved by granting fiscal incentives, like degressive depreciation or a tax break. Important maintenance and renovation measures should generally be taken into account in the year they occurred even if they exceed 15 percent of the acquisition costs of the building. Therefore, the proposals made in Article 15(4) are welcomed.

⁷ Kuniberts Lennerts et al. (2021): VERANTWORTUNG ÜBERNEHMEN – Der Gebäudebereich auf dem zur Klimaneutralität, p. 194, Link: <https://zia-deutschland.de/wp-content/uploads/2021/12/Verantwortung-uebernehmen-Gutachten.pdf>

⁸ *ibid.*

⁹ Boston Consulting Group (2021): CLIMATE PATHS 2.0, October 2021, p. 38, Link: <https://web-assets.bcg.com/02/a6/91958a6f4287a0490e24ef56d2b5/climate-paths2-summary-offindings-en.pdf>

Article 16 Energy performances certificates

The harmonisation of the energy performance certificates is supported by the BDI. The implementation should be linked with least possible financial and bureaucratic effort for businesses while at the same time ensuring high quality and information content. In order to ensure this, the EPCs should be based on the calculated and metered energy use. This is important to ensure the acceptance among the European citizens and businesses. Furthermore, it should be examined how the element 'greenhouse gas emissions' could be made a further important benchmark for the EPC rating.

In addition, the energy certificate should be interlinked with the other documentation on the building and be as comparable as possible throughout Europe, as well as reflecting the future security (e. g. by integrating the SRI) of the building.

- Recommendation: The Energy Performance Certificates should be based on calculated as well as metered energy use to increase the accuracy of the information and avoid rebound effects. Both the energy demand as well as the energy consumption should be mandatory elements of the EPC, playing into the EPC rating. The energy demand should be re-evaluated after a major renovation, the energy consumption should be evaluated/updated at regular intervals of three years. In this case an event-related renewal of the EPC is not necessary as lined out in Article 17 EPBD.
- Recommendation: Interlink the EPC with other documentation like the renovation passport and include possible future innovations like the SRI.
- Recommendation: The BDI supports the usage of greenhouse gas emission as an indicator and recommends developing it to a further important benchmark.

Article 19 Databases for energy performance of buildings

The introduction of a database for the energy performance of buildings is welcomed to safeguard the necessary data for further use and monitoring in the National Building Renovation Action Plans. An effective building database must be supplied with data through energy performance certificates and should also include data from the renovation passports. It is important to have reliable data in order to monitor and to steer the renovation wave and the energy efficiency of buildings, but bureaucratic procedures have to stay as lean and efficient as possible, in order not to slow down efforts. The Commission needs to ensure that a fully operational system is launched. Furthermore, the implementation should be linked with the least possible financial and bureaucratic effort for businesses. This is important to ensure the acceptance among European citizens and businesses. When it comes to requirements for the non-residential building sector, it is always necessary to differentiate precisely according to the respective asset class – unfortunately, this is still not done enough.

Article 20 Inspection

No alternative measures for inspection obligations

The concretisation of the inspection obligations is welcomed. However, Article 20.6 still leaves room for exceptions to inspection obligations and thus also for the use of building automation and control functions as well as electronic monitoring. In Germany, a lot of heating systems are not optimally adjusted due to the lack of regular inspection obligations, respectively a lack of building automation and electronic monitoring.

- Recommendation: Leave no room for exceptions from inspections obligations.

Assess inspection threshold

In order to include more heating, ventilation and air conditioning systems the threshold of 70 kW should be assessed.

Introduce Article ‘Neighbourhood district, portfolio and approaches’

Article 25 mentions that in the next review period in the end of 2027 integrated district or neighbourhood approaches will be examined. From the BDI’s perspective this is too late and needs to be included as soon as possible into the EPBD.

Integrated neighbourhood, district and portfolio approaches are an important part of the energy future, because a broader, holistic approach is necessary to make full use of all potential synergies a) between individual buildings, b) between buildings and a flexible, smart grid and c) between buildings and variable options for the use of heating and e-mobility.

Unfortunately, further central questions, such as the balancing of the use of renewable energies in buildings, remain unresolved in the EPBD.

- Recommendation: Insert an article for integrated district, portfolio and neighbourhood approaches.

Introduce Article ‘Energy management systems and monitoring’

To strengthen the use of energy management systems and the sustainability of installations in existing buildings, we propose a new article in the EPBD that further regulates the use of energy management systems in all types of buildings and the regular inspection and optimisation of installations based on the requirements included in Article 20(8).

ANNEXES to the Proposal for a Directive of the European Parliament and of the Council on the energy performance of buildings (recast)

Annex III REQUIREMENTS FOR NEW AND RENOVATED ZERO-EMISSION BUILDINGS AND CALCULATION OF LIFE-CYCLE GLOBAL WARMING POTENTIAL (GWP)

The BDI supports a harmonised approach towards zero-emission buildings. It is only consequent to define these uniformly in the EU in the Mediterranean, Oceanic, Continental and Nordic climate zone and to distinguish between residential and office buildings. With respect to the thresholds the affordability of living and building should be safeguarded, as this is an important socio-political issue in Europe. The expansion of the zero-emission building standard needs to carefully address also the social implications (i. e. rising costs for building measures) which will occur.

However, setting similar minimum requirements for new and existing buildings is neither economical nor technically applicable. For new buildings it is technically much easier and – with existing technologies – economical feasible to plan and build zero-emission buildings, fulfilling the defined primary energy requirements. It can be much more challenging – and in many cases – economically impossible to fulfil the same requirements for existing buildings.

From the BDI's perspective the threshold figures lined out in Annex III should characterise the standard for new buildings. A renovated building might not be able to achieve this level due to a variety of legal and/or technical obstacles. A renovated building is only able to achieve this level with a huge effort and high costs which can only be achieved with appropriate financial support through subsidies. None of the current German studies on climate protection scenarios describes a need for the average of refurbished buildings to meet the same standard as future new buildings. Thus, a clarification is needed so that linked legislation (for example the EU Taxonomy) or finance schemes do not refer to this figure as an achievable standard in the near future for existing buildings or buildings that have undergone major renovation.

Furthermore, the categorization of states into single climate zones as promoted is unsuitable for practical (technical) use and should therefore be differentiated according to the purpose.¹⁰

¹⁰ The climate in Kiel, Garmisch-Partenkirchen, Aachen und Dresden should technically belong to different climate zones.

- Recommendation: Clarify that zero-emission buildings characterise the standard for new buildings.
- Recommendation: Define separate requirements for new and for existing buildings, reflecting the technical and economic feasibility.
- Recommendation: Categorize climate zones according to their purpose.

About BDI

The Federation of German Industries (BDI) communicates German industries' interests to the political authorities concerned. She offers strong support for companies in global competition. The BDI has access to a wide-spread network both within Germany and Europe, to all the important markets and to international organizations. The BDI accompanies the capturing of international markets politically. Also, she offers information and politico-economic guidance on all issues relevant to industries. The BDI is the leading organization of German industries and related service providers. BDI represents 40 inter-trade organizations and more than 100.000 companies with their approximately 8 million employees. Membership is optional. 15 federal representations are advocating industries' interests on a regional level.

Imprint

Federation of German Industries e.V. (BDI)
Breite Straße 29, 10178 Berlin, Germany
www.bdi.eu
T: +49 30 2028-0

EU Transparency Register: 1771817758-48

Contact

Michael Wolfram
Senior Project Manager
Telefon: +49 30 2028-1704
m.wolfram@ieg.bdi.eu

BDI document number: D 1488