

From: [REDACTED]@zia-europe.eu>
Sent: 15 November 2022 19:25
To: WERNER Elisabeth (SG)
Cc: [REDACTED] (SG); [REDACTED]
Subject: Meeting Elisabeth Werner- ZIA
Attachments: 202207 ZIA Basel_III position paper.docx; 202211 ZIA_Basel PR Council engl 20221109.docx

Follow Up Flag: Follow up
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Dear Ms. Werner,

I would like to express our gratitude again that you took the time to meet the ZIA senior management and that we had a chance to elaborate more on our members' concerns, and where we see opportunities, on different key policy files such as the EPBD, Basel or digitalisation, also as a tool to reach the Green Deal targets, to mention only a few.

As discussed, the Basel file is one of the sector's key concerns these days. We support the objective to stabilise financial markets and welcome the reasonable approach in the Commission's implementation proposals of the Basel agreement. We are highly concerned, though, about ideas, as expressed by some members of the European Parliament, to go far beyond these already significant increases in terms of requirements stemming from CRD/R. Specifically in times with

- an upcoming recession
- major interest rates increases
- (in recent years) unprecedented inflation rates
- increasing cost of building materials
- a lack of qualified staff also in the building sector
- a lack of new housing units for European citizens as a consequences of missing funding, staff, reasonable costs, and
- increasing political tensions due to this development all over Europe,

harming more than necessary the European economy including the real estate sector - which stands for 20 % of the German economy's value added - needs to be avoided.

At the same time, realistic requirements, such as EPBD-MEPS including reasonable transitional measures are also as crucial as an innovative-friendly and technologically-neutral regulatory environment allowing for digital innovations, such as using AI in buildings, that can play a *major* role in achieving the 2030/2050-targets.

Please find attached, as discussed, our Basel position paper as well as our press release on the very much welcomed Council approach. I also cc [REDACTED] in this mail for obvious reasons. Furthermore, you might want to have a look at our [Innovation Radar](#) demonstrating which kind of Green Deal-supporting innovations our vibrant PropTech scene provides on an already technical feasible and scalable level.

We would be delighted to continue our exchange with you and stay available anytime for information we our members might be able to provide to you, cabinets and services.

Kind regards,

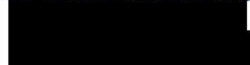
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