



From Data Point to Decision

Standardized Data Collection as the Foundation for
Future-Ready Real Estate

POSITION PAPER OF A WORKING GROUP OF ÖGNI

Keywords

Standardized data collection, consumption data, data points, life-cycle-related building data, European building database, standardization of energy performance certificates, digital transformation, future-proof properties, European regulations, EU Energy Performance of Buildings Directive (EPBD), ESG reporting requirements

Executive Summary

The construction and real estate industry is undergoing a fundamental digital transformation: the central problem is not a lack of data, but the absence of binding rules on which data are made usable, in what structure, quality, and under whose responsibility. This position paper sets out how standardized data collection can become the strategic foundation for future-ready real estate.

The starting point is the growing pressure from European regulatory frameworks – the EU Taxonomy, the CSRD, and the EPBD – which make valid, life-cycle-related building data essential. Currently, the data situation in Austria is highly fragmented: consumption data are collected by energy suppliers, submetering service providers, and owners at differing intervals and in differing formats, without uniform standards or consistent digital access. In addition, inconsistent legal requirements across Austria's federal states and data protection-related uncertainties make the systematic use of existing data more difficult.

As a structural solution, the ÖGNI working group recommends the broad implementation of a uniform framework for digital building data across the entire life cycle, such as the one already set out in DIN SPEC 91475.

Added value is created for many stakeholder groups. Owners and property managers gain a sound basis for decisions on operation and renovation; institutional investors can meet ESG reporting obligations and improve financing terms; occupants benefit from more transparent billing; and the public sector gains a robust basis for climate policy.

Finally, the working group formulates seven concrete demands: the mandatory provision of standardized building data by data owners; the establishment of a central European building database; the standardization of data collection; the anchoring of relevant building data to the property itself; the complete digitalization and standardization of energy performance certificates; the standardized transmission and validation of operational data; and the systematic feedback of building performance to owners by network operators.

Table of Contents

Keywords & Executive Summary	3
Working Group Participants & About ÖGNI	5
Relevance of the Working Group: Data instead of Assumptions	6
System Boundaries of this Position Paper	7
Status quo in Austria	8
Checklist: Status Quo of Consumption Data Collection	9
Who must or can provide data, and when?	10
Which data in what form: A uniform Data Language for buildings	11
Digression: Consideration of Requirements of the GDPR and DSG	13
For what purpose must data be made available? Example: EPBD	14
What Models for Collecting Building Data exist?	15
Consumption Data Collection: For whom does what value arise?	17
Conclusion	18
Demands	19
Sources	21

Working Group Participants

We would like to thank all participants for their contribution to the ÖGNI working group “From Data Point to Decision – Standardized Data Collection as the Foundation for Future-Ready Real Estate”:

- Jörg Buß (DREA)
- Peter Engert (ÖGNI)
- Michael Haugeneder (ATP sustain)
- Dominik Hartmann (ATP sustain)
- Sabine Huger (ÖGNI) - **Co-Lead WG**
- Ferdinand Kumle (Lookthrough)
- Rainer Marschall (AREALIS)
- Martin Renezeder (BUWOG Group)
- Katharina Saxa (ÖGNI) - **Co-Lead WG**
- Nino Tlapak (DORDA)

About ÖGNI



The **Austrian Sustainable Building Council (ÖGNI)** is an NGO (non-governmental organisation) and NPO (non-profit organisation) that has been working since 2009 to **establish sustainability in the construction and real estate industry**. As a central platform, ÖGNI promotes professional exchange and the further development of the industry. By **certifying buildings and districts**, ÖGNI demonstrates the added value of sustainable real estate. ÖGNI also offers **EU Taxonomy verifications** and imparts practical knowledge through its **academy**.

Members benefit from networking, visibility, high-level involvement in various formats and a strong national and international network. As a system partner of the **DGNB** (German Sustainable Building Council) and an established member of the **World Green Building Council**, as well as with its subsidiary **CPEA** (Climate Positive Europe Alliance) in Brussels, ÖGNI brings international perspectives and European quality standards to the Austrian market.

1. Relevance of the ÖGNI Working Group

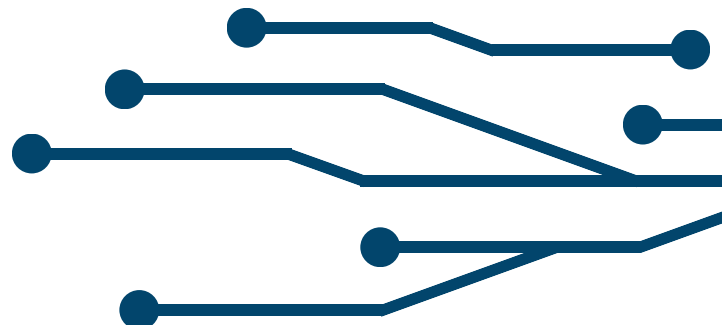
Data Instead of Assumptions

Digitalization is a key lever for the future viability of the construction and real estate industry. Valid data create the necessary conditions to meet growing regulatory requirements – in particular from the EU Taxonomy, the CSRD, and the EPBD – efficiently, transparently, and robustly. At the same time, it enables the systematic shift from blanket assumptions to real, quality-assured, life-cycle-related data. On this basis, ESG targets can be effectively operationalized, sound investment and renovation decisions can be made, and technologies – in particular artificial intelligence – can be deployed in a targeted way. Digitalization is therefore a strategic prerequisite for efficiency, sustainability, and competitiveness.

The existing conditions in the building sector make the fundamental transformation toward a zero-emission building stock, as well as the creation of a digital material register, more difficult, while also affecting investment in digitalization. This is particularly evident in the following challenges:

- The scale of the building stock that must be upgraded to meet the Paris climate targets is considerable.
- The capital required for the transformation is extraordinarily high.
- Construction and renovation projects take a long time to implement; strategic misjudgments are difficult, or costly, to correct.
- Incorrectly or inefficiently designed, or oversized, building systems and construction materials lead to considerable resource use and place a burden on supply networks and supply chains at the expense of other users.

Against this background, this position paper addresses the question of who provides which data, when, in what form and for what purpose; for whom this creates value; and how obstacles to data delivery can be removed. A particular focus is placed on access to, and handling of, building consumption data. What incentives could be created for data providers was not addressed within the scope of this working group. This is to be discussed and developed further in the working group „Targeted Digitalization through Transparent Data Flows“ as part of the ÖGNI Symposium 2026. The findings presented here therefore also serve to prepare for the ÖGNI Symposium 2026, which will take place on October 22, 2026, and will focus, among other things, on the topic of „Targeted Digitalization through Transparent Data Flows.“



System Boundaries of this Position Paper

The following questions define the system boundaries of this position paper:



WHO must [\(Chapter 3\)](#).



WHEN [\(Chapter 3\)](#).



provide WHICH data [\(Chapter 4\)](#).



in what FORM, and [\(Chapter 4\)](#).



for what PURPOSE (WHY), and [\(Chapter 6\)](#).



for WHOM does arise [\(Chapter 8\)](#).



what VALUE from it, and [\(Chapter 6\)](#).



what INCENTIVES can be created if no direct value arises for data providers? (open)



What OBSTACLES exist and how can they be removed? [\(Chapter 10\)](#).

2. Status quo in Austria

The digitalization of buildings today spans numerous phases of the life cycle – from digital terrain modeling through planning and construction to deconstruction and recycling. While considerable progress has already been made in these areas, the degree of digitalization during the long operational phase of buildings, particularly with regard to resource efficiency and emissions reduction, remains limited.

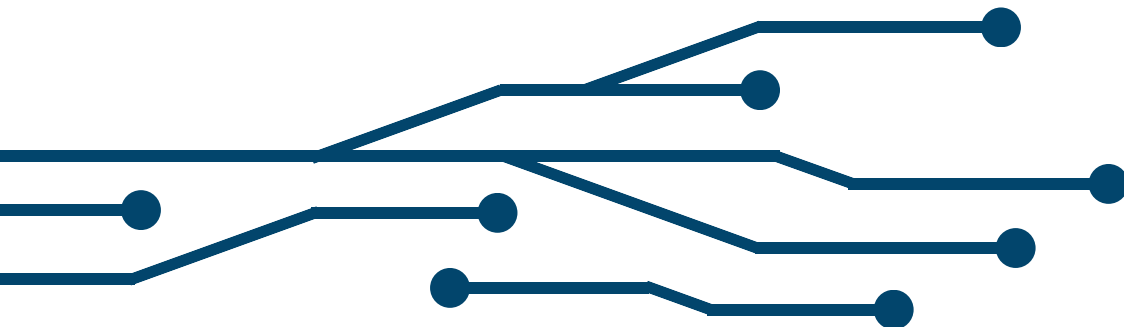
A key basis for assessing and optimizing building performance is the collection of consumption data. This data differs depending on the purpose of collection, the point of measurement, and the actors involved.

Fundamentally, depending on how the data are used, a distinction must be made between

- total consumption data for the building („main meter“ / „Wurzelzähler“) versus consumption data for individual units („tenant meter“ / „Mieterzähler“), and
- the granularity of the data (15-minute intervals versus monthly or annual figures)

However, the widespread, cross-utility availability of high-resolution, granular consumption data currently represents a considerable organizational and economic effort, both at building level and at the level of individual units.

In Austria, for example, energy and water consumption data are primarily collected by energy and water utilities, submetering service providers, and by building owners and property managers themselves. Depending on the utility, data collection takes place at different intervals; a reading and billing of actual consumption occurs at least once a year. While modern metering infrastructure – particularly smart meters in the electricity sector – enables remote reading at short time intervals, older metering systems still require manual on-site readings. In addition, inconsistent legal frameworks at the level of Austria's federal states, together with differing levels of ambition among network operators and utilities, make standardized and consistent data collection more difficult.



Checklist

Status Quo of Consumption Data Collection

Consumption data collection for individual units:

- **Electricity:** smart meter market penetration is high; provided the user has given prior consent, data are available at 15-minute intervals, but only for certain users; making individual metering points and their consumption values available to third parties is possible in principle, but remains cumbersome and difficult in practice; separate user consent is required to record 15-minute consumption values
- **Gas:** usually analog and available on an annual basis; tenants can obtain consumption values through a visual meter reading, but making this data available to third parties electronically is not possible
- **District heating / district cooling:** under the legal provisions of the Austrian Energy Efficiency Act (EEffG) §55(2) in conjunction with the Heating Costs Act (HeizKG) §17, individual consumption data would have to be made available to users monthly from January 1, 2027; granular data could be stored with users' consent; nationwide implementation is not yet available; data are usually not available
- **Water:** data can only be determined using annual billing volumes; available to property owners or their property managers

Consumption data collection for the entire building:

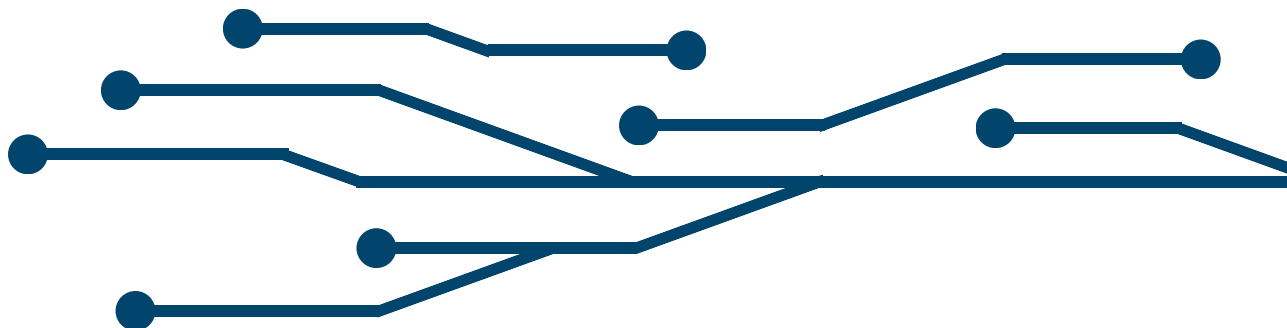
- **Electricity and gas:** a small number of regional network operators have recently begun offering the retrieval of annual figures
- **District heating / district cooling:** due to a lack of legal accessibility, obtaining consumption data for the entire building is only possible in isolated cases;
- **Water:** annual totals in connection with the water operating cost statement are available for the entire building; can only be obtained via the building's own infrastructure.

3. WHO must or can provide data, and WHEN?

Who is currently even able to provide data in order to capture a property in its entirety, and at what point in time? Fundamentally, a distinction must be made between three relevant data sources, or data holders: users or tenants, property owners or their property managers, and energy suppliers or network operators.

At present, there is no general legal obligation to provide individual consumption data for particular units to third parties for the purposes of property valuation. Obligations to provide data exist primarily in the relationship between the supplier, the owner or property manager, and the respective users, in particular within the framework of operating, heating, cooling, and hot water cost statements.

For property valuation, this means that owners and property managers should provide the building-related consumption and billing data that they lawfully hold, in particular annual statements, total consumption figures, and records of energy, heating, cooling, and water consumption. Individual consumption data for specific users, however, may only be used or passed on to third parties if there is a legal basis, a contractual obligation, or the explicit consent of the users concerned. Granular electricity consumption data, such as quarter-hourly values from smart meters, is therefore not automatically available for valuation purposes.



4. WHICH data in what FORM?

A uniform Data Language for Digital Buildings

In order to clarify which data are required to capture a building in its entirety and assess it in terms of its various aspects, it is necessary to identify which data are needed and in what form. DIN SPEC 91475 can be used as an answer to this question. It defines a uniform framework for the structured collection, organization, and use of digital building data across the entire life cycle of a property. The goal is to build a standardized, transparent, and interoperable data foundation that effectively

supports various fields of application, including operation, sustainability assessment, ESG management, renovation, and other digitalization processes.

To ensure unambiguous assignment and machine-readable further processing, DIN SPEC 91475 provides for the use of a unique identifier (UID) for each data point. The defined data points are organized into four categories (see checkbox).



Checkbox

Data Point Categories According to DIN SPEC 91475

Master Data (77 DP*)

This includes property-related data (11 DP), building use (8 DP), building address (7 DP), floor area data (21 DP), energy performance (14 DP), and sustainability (16 DP)

Site Characteristics (66 DP*)

This includes data on water (9 DP), soil (9 DP), temperature (15 DP), solar radiation (4 DP), air pollution (3 DP), natural hazards (16 DP), infrastructure (4 DP), and protection zones (6 DP)

Operational Data (87 DP*)

This includes data on the operating period (2 DP), electricity consumption (8 DP), electricity generation (9 DP), heat consumption (8 DP), heat generation (8 DP), cooling consumption (8 DP), cooling generation (8 DP), water (12 DP), waste (6 DP), chemicals management (4 DP), and greenhouse gases (14 DP)

Building Data (93 DP*)

This includes, from Cluster A (environmental impacts of the building resulting from materiality), basic data (8 DP), pollutants (4 DP), circularity (17 DP), and environmental burden (12 DP), and, from Cluster B (impact on...), data on water (17 DP), soil (12 DP), and biodiversity (23 DP)

*Data points

Comparing DIN SPEC 91475 with the DGNB system in terms of the consistency of its data points shows that some of the information defined there can, in principle, be used to calculate and assess DGNB KPIs. However, this occurs to varying degrees. The DGNB system, for example, comprises a total of 29 criteria for the New Construction of Buildings certificate, with 112 key performance indicators (KPIs). Their calculation currently draws on 229 different data points. Of these data points, 129 can be clearly assigned to DIN SPEC 91475. These 129 data points, in turn, can be used to describe 63 of the total 112 DGNB KPIs, which are distributed across 17 of the 29 different DGNB criteria (New Construction V23.1). In total, 25 KPIs, or data points, were also identified that fully match in aggregation, definition, and unit.

This comparison shows that DIN SPEC 91475, with its idea of standardization, provides an important basis for the digitalization and structured use of building data. However, the main challenges lie less in the volume of available data and more in achieving a uniform language, consistent

definitions, and consistent aggregation levels and units. A more strongly harmonized data structure across all relevant areas is therefore needed for practical data use.

In addition to the technical data points, which are also structured and validly reflected in a management process such as ÖGNI's DGNB certification, continuous risk assessment exists as a topic arising from the capital markets in connection with property valuation and the resulting ratings. Alongside various influencing factors in the capital markets, 29 data points have emerged from the ZIA KPI list (practicable sustainability KPIs for the real estate and financial industry, standardized by the Zentraler Immobilien Ausschuss [Central Real Estate Committee] and the vdp), which in turn correspond to the data from ÖGNI's DGNB certification and from DIN SPEC 91475. These are mainly data from the energy performance certificate and continuous operational (monitoring) data. A risk assessment can only take place once the data has been fully and validly disclosed.

Checkbox

ÖGNI's DGNB certification system reflects a holistic view of sustainable buildings at an internationally recognized level of quality. It provides uniform and comparable criteria for different building types, entire districts, or individual interior spaces. Certification is possible for every phase of a building's life cycle: construction sites, new construction of buildings, buildings in use, renovation of buildings, and deconstruction. More information at www.ogni.at.

5. DIGRESSION:

Consideration of the Requirements of the GDPR and the Austrian Data Protection Act (DSG) §

In addition to a harmonized data structure as the basis for practical data use, the legal requirements, which should ideally be supportive, must also be considered. The direction is clear: no more personal data should be collected than necessary, and ideally none at all. The focus is exclusively on consumption data at building level. Ideally, therefore, only anonymous data that cannot be attributed to any natural person – such as tenants or owners – should be collected from the outset. This fully corresponds to the principle of storage and data minimization under Article 5 GDPR.

If, due to the broad interpretation of attributability, individual data nonetheless allow conclusions to be drawn about natural persons or – equally protected in Austria – legal persons, the GDPR applies in full. In such cases, a clear legal basis under Article 6 GDPR is required.

The goal should be to create a clean legal basis for the collection and processing of such consumption data that appropriately safeguards data protection and the interests of the data subjects. On this basis, the entire data processing operation – from initial collection through transmission to preparation – should be grounded in Article 6(1)(c) GDPR.

If no such explicit legal basis is created, then, given the lack of practical feasibility of voluntary consent, the only remaining option is to rely on legitimate interests under Article 6(1)(f) GDPR. In this case, a detailed balancing of interests must be carried out to determine whether, and which, data are genuinely essential to fulfilling the purpose, and why no less intrusive means are available (necessity and proportionality). Even though, under settled case law, lower opposing interests of the data subjects can be assumed where predominantly publicly available data are collected – for example via the land register – a residual risk remains for every participant in the processing chain due to potential complaints and a differing interpretation by the data protection authority or the civil courts.

Regardless of this, where personal data are present, all other obligations under the GDPR must also be fulfilled – from updating the records of processing activities, to preparing privacy notices, to upholding data subjects' rights (e.g. to access, restriction, or erasure). The creation of an appropriate and suitable legal basis within the meaning of Article 6(1)(c) GDPR is therefore desirable.

6. For what PURPOSE must data be made available?

an example: the Energy Performance of Buildings Directive (EPBD)

What is the purpose of a practical, harmonized data landscape – as called for above – that can be supported by legal requirements? An important part of answering this question lies in the growing regulatory requirements, for the fulfillment and demonstration of compliance with which valid data are needed.

One example: the recast „Energy Performance of Buildings Directive“ (also known as EPBD) – Directive (EU) 2024/1275 – forms the legal framework for a decarbonized building stock by 2050. In Austria, the technical implementation is primarily set out in OIB Guideline 6 (2025).

The Zero-Emission Building (ZEB) is thereby established as the new target standard. It replaces the Nearly Zero-Energy Building (NZEB) as the standard for new construction. A ZEB produces no on-site, operation-related greenhouse gas emissions from fossil fuels and will be mandatory for new public buildings from 2028 and for all new buildings from 2030.

Minimum Energy Performance Standards (MEPS) and a renovation obligation for the existing building stock are also included. The directive introduces binding minimum requirements that force the targeted renovation of the least efficient buildings (worst-first principle). For non-residential buildings (NRBs), specific threshold values apply for overall energy performance, expressed in terms of primary or final energy consumption. By 2030, all NRBs

must fall below the 16% threshold, and by 2033 below the 26% threshold, of the national stock. OIB Guideline 6 (2025) defines specific HWB (heating demand) reference lines as the indicator for this purpose, and exceeding them triggers a renovation obligation.

For residential buildings (RBs), what matters is the reduction of average primary energy consumption across the entire stock. By 2030, the primary energy consumption must fall by 16%, with at least 55% of this reduction to be achieved through the renovation of the worst-performing 43% of the residential building stock.

Capturing and managing these ambitious renovation targets requires a consistent digital data strategy and is regarded as key to implementation. The „worst performers“ are identified via national databases (in accordance with Article 22 EPBD), which are essential for determining precisely, on the basis of machine-readable energy performance certificates, which buildings fall within the worst-performing 16% or 26%.

National databases are also needed that link building data, EPC data, the new renovation passport, and actual energy consumption. Only in this way can progress along the reduction pathways be monitored transparently.



A final point worth mentioning is the digital building logbook. This serves as a central register for all relevant information, such as the life-cycle GWP and the material passport.

The example of the EU Buildings Directive shows how essential the availability of valid data is in order to present buildings, and all related topics, in a transparent and comprehensible way.

In addition to the technical regulatory framework governing data disclosure, some of this data also forms the basis for corporate ratings and risk assessment in capital transactions. Particularly where long-term contracts are concerned, monitoring data are, alongside planned data, essential – as can be seen from the [ZIA](#) data point list.

7. What Models for Collecting Building Data exist?

The data sources relevant to real estate differ in terms of level of detail, timeliness, and purpose. Administrative and statistical data form the basis and provide fundamental information such as year of construction, building type, usable floor area, or location. They are suitable for portfolio overviews, market analyses, and ESG baselines, but are usually not granular enough for operational or EU Taxonomy-compliant evidence.

GIS and 3D models supplement this data with location- and geometry-related information and support analyses of climate risks, PV potential, urban planning questions, and portfolio screening. BIM data go considerably deeper, containing component-level information on construction, materials, technical systems, and floor areas. Since such data are often missing in the existing building stock, scan-based methods such as laser scanning, photogrammetry, or scan-to-BIM are becoming increasingly important.

Digital platforms and data repositories such as Madaster or Concular structure material, component, and product information and make it usable for material passports, deconstruction planning, reuse potential, embodied emissions, and circular construction.

Operational data from energy bills, submetering, building management systems, or smart meter systems provide dynamic information on consumption, load profiles, and operating times. They are central to EU Taxonomy evidence, CRREM pathways, and net-zero strategies, but remain highly fragmented across the DACH region (Germany, Austria, Switzerland).

Certifications are indicator-based, comparable, and externally verified. They provide credible information on energy, materials, site quality, and governance aspects, but generally do not represent a complete building database.



No single data source is sufficient for a robust data foundation for real estate; rather, administrative data, GIS/3D models, BIM and scan data, material platforms, operational data, and certifications must be meaningfully linked together. What is decisive here is combining static building

data with dynamic consumption and material information, in order to soundly assess building stocks, derive renovation measures, and steer transformation pathways toward climate neutrality and a circular economy.

Checkbox

Summary: What Models for Collecting Building Data already exist in the DACH region?

A single data source is currently not sufficient for a sound assessment of real estate. Only the integrated interplay of basic administrative data, GIS and 3D geodata, BIM or scan-to-BIM information, dynamic operational data, and certification-based indicators enables a sufficiently granular, current, and life-cycle-oriented data foundation for ESG assessment, EU Taxonomy evidence, and renovation strategies.

8. Consumption Data Collection:

For WHOM does what VALUE arise?

For basic reporting purposes, usually only aggregated annual consumption data for the entire building are relevant. For the purposes of building optimization, renovation, or efficiency improvement, however, granular data are required.

Comprehensive, granular, and cross-utility consumption data collection creates considerable added value for different stakeholder groups.

Building Owners & Property Managers

- A sound basis for decisions on operational optimization, targeted renovation measures, and investment prioritization
- Demonstrable reduction of operating costs and preservation of property value
- Monitoring data, such as the ZIA data points, demonstrate data transparency and thus form the basis of the building owner's corporate rating, which in turn represents a lower risk when it comes to financing needs.

Users & Tenants

- More transparent operating cost statements and incentives for independently reducing consumption
- A basis for new services such as individual consumption forecasts or dynamic tariffs

Institutional Investors & Real Estate Companies

- Meeting growing ESG reporting and evidence obligations, in particular under the EU Taxonomy and CSRD

- Improvement of sustainability ratings with a direct effect on financing terms and portfolio valuations
- Energy efficiency as a value-creating factor: use of energy indicators by banks, investors, and appraisers to assess risks, future viability, and operating costs
- Monitoring data, such as the ZIA data points, demonstrate data transparency and thus form the basis of the building owner's corporate rating, which in turn represents a lower risk when it comes to financing needs.

Valuation & Certification

- The quality of sustainability certifications depends heavily on the accuracy and transparency of the building data provided.
- Digitalized data increase comparability, reduce risks, and provide objective evidence of a building's energy quality and performance.

Public Sector & Regulators

- A robust basis for climate policy and the evaluation of efficiency measures
- Indispensable for achieving Austria's climate targets and decarbonizing the real estate stock

The consistent collection, evaluation, and use of consumption data is therefore a strategic lever for cost reduction, climate protection, and regulatory future-readiness.

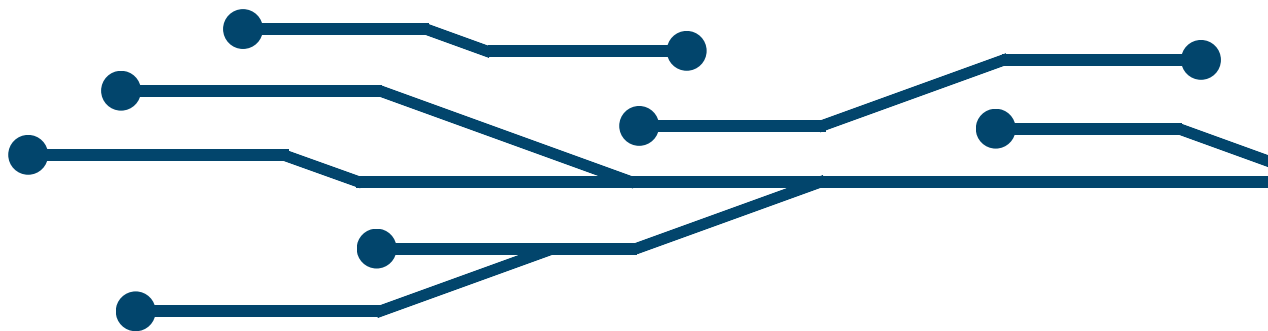
9. Conclusion

The central finding is that the construction and real estate industry does not primarily need more data, but rather a binding logic for which existing data are made usable, in what structure, quality, and under whose responsibility – and for what purpose. Digitalization is not an end in itself in this context, but an instrument for effectively achieving overarching goals such as regulatory evidence, renovation management, efficiency gains, and climate protection in the first place.

The future viability of the real estate industry depends significantly on whether it is possible to create transparent data flows and to meaningfully link consumption, building, material, and certification data with one another.

The risk assessments arising from ESG considerations on the capital markets are not possible on the basis of a uniform, structured, and publicly accessible data foundation, which automatically results in the highest level of risk being applied.

A major obstacle currently lies in the inconsistency of legal requirements between Austria's federal states. Differing requirements for network operators, together with varying levels of ambition among utilities, make uniform data collection by owners more difficult. Without nationwide, uniform, data protection-compliant legislation for the collection and use of consumption data, individual reporting requirements can indeed be met, but a genuine improvement in building efficiency is only possible to a limited extent on the basis of the data currently available. The gaps identified in the current state form the basis for the following concrete action items, or demands, of the working group.



10. Demands

1. Mandatory Provision of Standardized Building Data

Data owners (e.g. owners, operators, energy suppliers) must be required to provide relevant building data in **standardized, abstracted, and data protection-compliant form**. Interoperability must be ensured, and open, free-of-charge interfaces must be created for quality assurance.

2. Establishment of a Central European Building Database

Creation of an EU-wide database for:

- EU Taxonomy-compliant/non-compliant buildings
- standardized performance indicators

The decarbonization of the European economy can only be achieved if the necessary structures and data foundations are in place. In addition, the capital markets require a secure, transparent data basis for risk assessment and the related determination of costs – as called for in the accompanying report to the [ZIA KPI list](#) (as of May 14, 2025). This comprises property energy- and greenhouse-gas-relevant KPIs with 22 basic data points, 7 extended data points, and up to 51 informative data points.

3. Standardization of Data Collection

Introduction of uniform standards for data collection, such as DIN SPEC 91475.

4. Anchor Building Data as a Property-Bound Obligation

Relevant building data must be mandatorily bound to the property and anchored in a suitable form close to the land register. This ensures that important information remains permanently available, independent of the owner, over the entire life cycle of the building.

Ideally, therefore, only anonymous data that cannot be attributed to any natural person – such as tenants or owners – should be collected from the outset.



5. Complete Digitalization and Standardization of Energy Performance Certificates

- Uniform digital energy performance certificates
- Central registration – (since the end of 2025, complete registration by all 9 federal states has been possible, with central collection by Statistics Austria)
- Automatic validation against digital building data (e.g. planning data)
- Mandatory updating to as-built status following construction, linked to the completion notification: this can be regulatorily tied to measures subject to notification or acceptance requirements.

6. Standardized Transmission and Validation of Building Operational Data

Cleaned and standardized building operational and performance data must be regularly submitted to an appropriate database. This must include a mandatory comparison of planning/completion data (“as-built”) against actual performance, in order to transparently present any deviations and validate the quality of the data submission.

7. Systematic Feedback of Building Performance to Owners Based on Standardized Benchmarks

Network operators should be required to transmit aggregated total consumption data for all relevant utilities (e.g. electricity, gas, district heating) to building owners in a standardized and regular manner.

This provision of data must be carried out in such a way that it meets reporting requirements (including under the EPBD) and enables a realistic assessment of actual building performance.

For data protection reasons, it must be ensured that this feedback is made accessible exclusively to the owner and is processed in a neutralized, non-personal form.



Sources

Directive (EU) 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings (recast) (Energy Performance of Buildings Directive – EPBD), OJ EU L 1275, May 2024

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (EU Taxonomy Regulation), OJ L 198, June 2020

Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC, and Directive 2013/34/EU, as regards corporate sustainability reporting (Corporate Sustainability Reporting Directive – CSRD), OJ L 322, December 2022

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation – GDPR), May 2018

Austrian Federal Act on the Protection of Natural Persons with regard to the Processing of Personal Data (Data Protection Act – DSG), Federal Law Gazette (BGBl.) I No. 165/1999, as last amended by the 2018 Data Protection Amendment Act, BGBl. I No. 120/2017, as amended.

Austrian Federal Act on Improving Energy Efficiency in Households, Businesses, and the Federal Government, and on Energy Consumption Recording and Monitoring (Federal Energy Efficiency Act – EEffG), BGBl. I No. 72/2014, as last amended by BGBl. I No. 59/2023; in particular §55(2) (individual consumption metering), as amended.

Austrian Federal Act on the More Economical Use of Energy through Consumption-Based Billing of Heating and Hot Water Costs (Heating and Cooling Cost Billing Act – HeizKG), BGBl. No. 827/1992, as last amended by BGBl. I No. 22/2023; in particular §17 (billing of supply costs), as amended.

DIN SPEC 91475:2024-03: ESG – Data Points for the Environmental Analysis of Real Estate; with digital annex. Berlin: German Institute for Standardization (DIN), March 2024.

OIB Guideline 6 (2025): Energy Saving and Thermal Insulation. Vienna: Austrian Institute of Construction Engineering (OIB), 2025.

<https://zia-deutschland.de/kpi-liste/>; as of June 15, 2026



Österreichische Gesellschaft für Nachhaltige Immobilienwirtschaft
Austrian Sustainable Building Council

Mayerhofgasse 1 | Top 22
1040 Vienna
Austria

+43 664 15 63 507 | office@ogni.at | www.ogni.at
© ÖGNI GmbH June 2026

Prepared by the Working Group "From Data Point to Decision: Standardized Data Collection as the Foundation for Future-Ready Real Estate"

Editors: Katharina Saxa, Sabine Huger

Layout: Katja Haunold



All rights reserved. All information has been compiled with the utmost care. ÖGNI does not guarantee the accuracy and completeness of the content.

Member of:



Partner of:

