

Eco Wise - Consultation Response

Draft Standardisation Request to the European Committee for Standardisation as regards Digital Building Logbooks

Notification under Article 12 of Regulation (EU) No 1025/2012

Response from: Eco Wise **To:** European Commission, DG GROW. **Date:** 17 February 2026 **Reference:** Draft Commission Implementing Decision on a standardisation request to CEN as regards digital building logbooks (notified 22 January 2026)

1. Introduction

Eco Wise welcomes the European Commission's initiative to request the European Committee for Standardisation (CEN) to develop European standards for Digital Building Logbooks (DBLs). We strongly support the ambition set out in the European Strategy for Housing Construction (COM(2025) 991) to establish DBLs as a single, authoritative source of building information, and we recognise the importance of harmonised standards in reducing fragmentation and enabling interoperability across the European built environment.

However, having carefully reviewed the draft Implementing Decision and its Annexes, we have identified a number of significant shortcomings that, if left unaddressed, risk undermining the stated objective of the standardisation request — namely, that DBLs should support "information about buildings from design and construction to renovation and demolition leading to improved decision making at every stage of their life cycle" (Recital 1).

We respectfully submit the following observations and recommendations for the Commission's consideration ahead of the finalisation of this request.

2. Incomplete coverage of the building life cycle

2.1. The issue

The draft standardisation request states that DBLs should serve as a source of information across the entire building life cycle. Recital 1 explicitly refers to "design and construction to renovation and demolition." However, the detailed data structure requirements set out in Annex II, Part B, Section 2.1.2 are overwhelmingly oriented toward buildings that already exist and are in use. The data categories — administrative information, general building information, physical and material data, building operation and use, building performance, smart readiness, finance, and building documentation — primarily describe the characteristics and performance of a standing building.

Critical life cycle stages are either absent or inadequately addressed:

Design and construction phase. The data structure does not require the capture of information generated during the design and construction process — such as design intent, specification data, as-designed versus as-built information, commissioning records, quality assurance documentation, construction methodologies, or supply chain and procurement data. The reference to "design and



plans" in Section 2.1.2.8 (Building documentation) is limited to a repository function and does not address the structured integration of design and construction data into the DBL.

Renovation. While the data structure references Energy Performance Certificates and Renovation Passports under building performance (Section 2.1.2.5), it does not comprehensively address the data needs of renovation projects. A DBL that genuinely supports renovation decision-making should capture pre-renovation condition assessments, scope and specifications of renovation works, records of interventions carried out, updated performance data post-renovation, and the relationship between planned and actual renovation outcomes. The current framing treats renovation as a performance reporting event rather than as a complex, data-rich phase of the building life cycle.

Deconstruction and demolition. The standardisation request makes no provision for data related to the end-of-life phase of a building. There is no requirement to capture information about deconstruction strategies, demolition methodologies, waste management, material recovery and reuse potential, or compliance with waste legislation. This is a significant omission given the EU's circular economy objectives and the increasing policy focus on construction and demolition waste under the Waste Framework Directive and the Construction Products Regulation.

2.2. Recommendation

We recommend that the Commission revise Annex II, Part B, Section 2.1.2 to include explicit data categories for:

- **Design and construction** — covering design intent, specifications, as-designed and as-built data, commissioning records, construction methodologies, and supply chain information;
- **Renovation** — covering pre-renovation assessments, scope of works, records of interventions, and post-renovation performance data, going beyond the current limited reference to Renovation Passports;
- **Deconstruction and demolition** — covering deconstruction strategies, demolition records, material recovery, waste management, and circularity data.

This would bring the data structure into alignment with the life cycle ambition stated in Recital 1 and with the definition of DBL in Article 2(41) of Directive (EU) 2024/1275.

3. Digital Product Passports incorrectly classified as static data

3.1. The issue

Annex II, Part B, Section 2.1.2.3 categorises "Physical and material data" as "mainly static data" and lists Digital Product Passports (DPPs) established by European legislation within this category. While it is true that certain physical and material characteristics of a building are relatively stable over time, the classification of DPPs as static data misrepresents the nature and potential of DPPs as envisaged under the Construction Products Regulation (EU/2024/3110) and the Ecodesign for Sustainable Products Regulation (EU/2024/1781) and underestimates their role in enabling circular economy outcomes in the built environment.

Digital Product Passports are not inherently static instruments. When introduced at batch or item level and linked to specific building components, DPPs can become dynamic data objects that are updated,



supplemented, and referenced throughout the building's life cycle. Consider, for example, the case of floorboards installed in a residential building:

- **At installation**, batch-level or item-level DPP data for the floorboards is linked to the DBL, associated with specific rooms or building zones, and may include information on material composition, origin, environmental footprint, and expected service life.
- **During the in-use phase**, DPP data may be updated with maintenance records, condition assessments, or performance monitoring data relevant to the specific installed floorboards.
- **At renovation or retrofit**, when floorboards are replaced, new product batch DPP data including material data is introduced into the DBL for the replacement products, while the DPP data for the removed floorboards is retained and used to assess recyclability, reuse potential, and waste classification — directly supporting circular economy decision-making.
- **At component level**, DPPs can be tagged and tracked per room, per floor, or per building zone, enabling granular asset management that supports maintenance planning, warranty tracking, and end-of-life material recovery.

This dynamic relationship between DPPs and the DBL is essential for realising the objectives of the EU's circular economy framework in the construction sector. Treating DPP data as static forecloses the possibility of the DBL functioning as a living record of the materials and products within a building, and limits its utility for maintenance (component-level replacement decisions), renovation (understanding what is being removed and what is being introduced), and end-of-life (assessing the recyclability and reuse potential of materials in situ).

The classification of physical and material data as "mainly static" also creates an artificial boundary between Sections 2.1.2.3 (Physical and material data (mainly static data) and 2.1.2.4 (Building operation and use — mainly dynamic data) that does not reflect the reality of modern asset and material management in buildings.

3.2. Recommendation

We recommend that the Commission revise Section 2.1.2.3 to remove the characterisation of physical and material data as "mainly static." Instead, the standardisation request should:

- Recognise that DPP data linked to building components can be both static and dynamic, depending on the level of granularity (product, batch, or item level) and the life cycle stage;
- Introduce an optional dynamic data management dimension for physical and material data, enabling — but not mandating — the tracking of DPP data at component level within the DBL, including updates at renovation, replacement, and end-of-life;
- Require the data structure to support the linking of DPP data to specific building elements or zones, facilitating component-level traceability;
- Ensure that the framework supports the retention of historical DPP data for removed or replaced components, to enable recyclability and reuse assessments.

This approach would align the DBL standard with the ambitions of the revised Construction products Regulation and the Ecodesign for Sustainable Products Regulation, support the circular economy objectives of the EU's construction policy, and significantly enhance the practical value of the DBL for



maintenance, renovation, and end-of-life decision-making — without imposing obligations on building owners or operators beyond what is proportionate to their digitalisation maturity.

4. Inadequate specification of machine-readable data formats

3.1. The issue

Annex II, Part B, Section 2.2.2 requires that the data structure, data dictionary, and metadata be provided "in human- and machine-readable format (e.g., XML)." While XML is a well-established data format, it is not representative of the current state of the art in data exchange and interoperability.

The sole reference to XML as an example of a machine-readable format is problematic for several reasons. Modern web services, APIs, and digital platforms overwhelmingly use JSON (JavaScript Object Notation) as the default format for data exchange. JSON is lighter, more readable, and more widely supported in contemporary software ecosystems than XML. Furthermore, linked data formats such as JSON-LD (JSON for Linking Data) are increasingly recognised as essential for semantic interoperability — a principle the standardisation request itself identifies as important (Annex II, Part A, Section 2.1).

By citing only XML, the draft risks signalling to CEN that legacy formats are sufficient, potentially resulting in standards poorly suited for integration with modern digital tools, platforms, and APIs.

3.2. Recommendation

We recommend that Section 2.2.2 be amended to reference a broader range of modern, horizontal machine-readable formats. At a minimum, JSON should be explicitly mentioned alongside XML as an example format. The Commission should also consider referencing JSON-LD to support the semantic interoperability objectives of the standardisation request, and should frame the requirement in technology-neutral terms that encourage CEN to adopt formats aligned with current industry practice and the evolving digital landscape.

5. Absence of requirements for Building Information Modelling (BIM) data ingestion

4.1. The issue

The draft standardisation request makes no reference to Building Information Modelling (BIM) or to the structured digital data formats that are widely used in the design, construction, and asset management phases of the building life cycle. In particular, there is no mention of the Industry Foundation Classes (IFC) standard — the open, ISO-standardised data format for BIM (ISO 16739) — or of the need for DBLs to be capable of ingesting, referencing, or linking to BIM data.

This is a significant gap. BIM is increasingly mandated or encouraged across EU Member States for public works and is the primary vehicle through which structured digital building data is created during design and construction. A DBL standard that cannot interface with BIM data will be unable to fulfil its role as a life cycle information repository, as it will be disconnected from the richest source of structured building data available.

The omission also risks creating a disconnect between the DBL standards and existing CEN and ISO standardisation work on BIM, including EN ISO 19650 (information management using BIM), EN ISO 23386 and EN ISO 23387 (data dictionaries and data templates for construction), and the IFC standard



itself. A DBL framework that does not address BIM interoperability will require costly and ad hoc integration solutions at national level, undermining the harmonisation objective of the request.

4.2. Recommendation

We recommend that the Commission include an explicit requirement in Annex II for the DBL standards to address the ingestion of, and interoperability with, BIM data formats — in particular the IFC (Industry Foundation Classes) open standard. The standards should define how structured data from BIM models can be mapped to, imported into, or linked from the DBL data structure.

This requirement could be included in Part A (General Requirements) under Section 2.1 on interoperability, or as an additional specific requirement in Part B. CEN should also be encouraged to ensure alignment with existing European and international BIM standards, notably EN ISO 19650, EN ISO 23386, EN ISO 23387, and ISO 16739.

6. Absence of a standardised identity management framework for Digital Building Logbooks

6.1. The issue

The draft standardisation request references a "unique building identifier" as one element of administrative information (Annex II, Part B, Section 2.1.2.1), but does not address the broader and more fundamental question of how each Digital Building Logbook itself should be uniquely and persistently identified across the European Union. Without a standardised approach to DBL identity management, the objective of creating interoperable, cross-border building data systems — and, critically, the ability to establish and operate DBL registries at national and European level — will be severely compromised.

The current draft leaves entirely open how a DBL is to be identified, referenced, and resolved by digital systems. This creates a significant risk of fragmentation: Member States may adopt incompatible identification schemes, making it difficult or impossible to link, query, or aggregate DBL data across borders. For DBL registries to function effectively — whether for regulatory compliance, market transactions, energy performance reporting, or circular economy tracking — each logbook must carry a globally unique, machine-resolvable identifier that can be reliably associated with a specific physical building.

Established international standards already provide robust frameworks for location and entity identification that could serve as the basis for DBL identity management. In particular:

- **GS1 Global Location Number (GLN)** — a widely adopted, globally unique identifier for locations and entities, used extensively in supply chain management and increasingly in the built environment. GLNs are compliant with **ISO/IEC 6523** (the international standard for the identification of organisations and organisation parts), providing a well-governed, scalable identification infrastructure.
- **Geographic coordinates (latitude and longitude)** — essential for unambiguously locating a building in physical space and for enabling spatial queries, mapping, and cross-referencing with geospatial datasets.
- **Structured address information** — necessary for human-readable identification and for interoperability with existing cadastral, postal, and administrative registers.



A robust DBL identity scheme should combine these elements: a globally unique identifier compliant with ISO/IEC 6523 (such as a GLN) to provide machine-readable uniqueness and resolvability, paired with geographic coordinates and structured address data to anchor the identifier to a physical location. This layered approach would ensure that DBLs can be reliably identified, discovered, and cross-referenced by both human users and digital systems across the EU.

The absence of any requirement in the standardisation request for CEN to address this foundational issue risks producing standards in which the DBL data structure is well-defined, but the logbooks themselves cannot be reliably found, linked, or managed at scale.

6.2. Recommendation

We recommend that the Commission include an explicit requirement — in Annex II, Part A (General Requirements) or as an additional item in Part B — for the standards to define a harmonised identity management framework for Digital Building Logbooks. This framework should:

- Require each DBL to carry a globally unique, persistent identifier that is machine-resolvable and suitable for use in digital registries;
- Build upon existing international identification standards, in particular ISO/IEC 6523 and established identifier schemes such as the GS1 Global Location Number (GLN), rather than creating a new, bespoke identification system;
- Require each DBL to be associated with geographic coordinates (latitude and longitude) and structured address information, to enable unambiguous linkage between the digital logbook and the physical building;
- Define the governance arrangements for identifier issuance, maintenance, and lifecycle management (e.g., what happens to a DBL identifier when a building is subdivided, merged, or demolished);
- Ensure that the identification scheme supports interoperability with existing national cadastral registers, building registries, and European data spaces.

This would provide the essential infrastructure layer upon which DBL registries, cross-border data exchange, and the broader digital building ecosystem can be built, and would prevent the emergence of incompatible national identification schemes that would undermine the harmonisation objective of the standardisation request.

7. Lack of a differentiated data access framework across life cycle stages and stakeholder roles

5.1. The issue

The draft standardisation request addresses data governance and access in general terms (Annex II, Part A, Section 2.3), establishing that building owners are the principal data owners, that access should be non-discriminatory, and that authenticated users should be able to access information on demand within an auditable and secure information chain. While these principles are welcome, they are insufficiently developed to guide CEN in producing a standard that is workable in practice.

A building passes through distinct life cycle stages — design, construction, handover, in-use operation, maintenance, renovation, and demolition — and at each stage, different stakeholders require access



to different categories of data. The standardisation request does not require the standards to define a differentiated access framework that reflects these realities. Specifically, it does not address:

- **Role-based access rights** — which categories of data should be accessible to which stakeholder roles (e.g., property owners and investors, architects and designers, structural and MEP engineers, principal contractors and subcontractors, facility managers, energy auditors, public authorities, tenants, prospective buyers, demolition contractors, waste management operators);
- **Phase-dependent access** — how access rights should evolve as a building transitions between life cycle stages (e.g., a contractor's access to design data during construction may differ from a facility manager's access to the same data during the in-use phase);
- **Granularity of access** — whether stakeholders should have access to full datasets, summary data, or specific data fields, depending on their role and the applicable life cycle stage;
- **Data contribution rights** — which stakeholders are authorised to add, modify, or validate data in the DBL at each stage, and under what conditions.

Without such a framework, the standard risks producing a data governance model that is either too permissive (raising data protection and commercial confidentiality concerns) or too restrictive (limiting the practical utility of the DBL). It also risks leaving these critical decisions to national implementation, which would undermine the harmonisation objective.

5.2. Recommendation

We recommend that the Commission add a specific requirement — either in Part A, Section 2.3 or as an additional item in Part B — for the standards to define a role-based, phase-dependent data access framework. This framework should, at a minimum:

- Identify the principal stakeholder roles that interact with a DBL across the building life cycle;
- Define which data categories each role should be able to read, write, and validate at each life cycle stage;
- Establish principles for managing transitions in access rights at key handover points (e.g., from construction to operation, from operation to renovation);
- Address the protection of commercially sensitive information (e.g., contractor pricing, design IP) while maintaining the interoperability and transparency objectives of the DBL.

This would provide CEN with a clear mandate to develop a data access model that is both practical and aligned with the data governance principles already set out in the draft.

8. Conclusion

Eco Wise strongly supports the Commission's initiative to standardise Digital Building Logbooks and recognises the potential of this work to transform how building data is managed across Europe. However, we believe the draft standardisation request, as currently formulated, falls short of the life cycle ambition articulated in the European Strategy for Housing Construction and in the legislative framework for DBLs.



The six shortcomings identified in this response — incomplete life cycle coverage, the misclassification of Digital Product Passport data as static, insufficient data format references, absence of BIM interoperability requirements, the lack of a standardised identity management framework, and the absence of a differentiated access framework — are not marginal issues. They go to the heart of whether the resulting standards will be fit for purpose in a modern, digitised construction sector committed to circular economy principles.

We urge the EU Commission to address these gaps before finalising the standardisation request to CEN, and we remain available to provide further detail or to participate in any stakeholder consultation on this matter.

