

Mr. Jean-Claude Juncker, President
Mr. Frans Timmermans, First Vice-President
European Commission
Rue de la Loi 200
B-1049 Brussels
Belgium

CC: Commissioners Mr. Vytenis Andriukaitis, Ms. Elżbieta Bieńkowska, Ms. Violeta Bulc, Mr. Miguel Arias Cañete, Ms. Corina Crețu, Mr. Jonathan Hill, Mr. Carlos Moedas, Mr. Pierre Moscovici, Mr. Jyrki Katainen, Mr. Günther Oettinger, Mr. Maroš Šefčovič, Ms. Marianne Thyssen, Mr. Karmenu Vella

Subject: A new start for the real estate/built environment sector

Monday, 30 March 2015

Dear Mr. Juncker
Dear Mr. Timmermans,

The European Commission work programme for 2015 sets out a new start for Europe. As representatives of the undersigned associations which are all active in diverse parts of Europe's real estate sector, we want this new agenda for change to prioritise a new start for our sector; to reflect an awareness of the important role our sector plays, one that is critical to the EU's economy and its citizens. It is time for a high level EU dialogue and strategy for Europe's real estate sector.

Commercial property alone contributed EUR 302 billion to the EU economy in 2013; almost double the contribution of the automotive or telecommunications sectors. The total value of residential housing in the EU is estimated to be approximately EUR 24 trillion. Investment in housing, other buildings and infrastructure totals more than EUR 1 trillion, when included with commercial property it represents 55% of capital investment in the European economy¹. According to Eurostat, around 1.1 million enterprises, many of which are SMEs, operate within our sector, employing around 2.6 million people².

Beyond these figures, the real estate sector plays a vital role in every aspect of the European economy, society and environment. Businesses and society cannot function without the services of commercial property, including the provision of offices, shops, factories and many other forms of real estate. In the residential sector all citizens have a right to decent and affordable housing. Buildings are where people live, work, learn and play. The built environment is of central importance to public health, productivity, quality of life, educational standards and cultural heritage.

Despite the sector's importance, it is not currently a central focus in either the Commission work programme or the Juncker Investment Plan. Infrastructure is part of the programme, and given the strong connection between buildings and infrastructure, and particularly between efficient buildings and a decreased need for new energy infrastructure, we believe the real estate sector at large is not given sufficient priority. We urge the Commission to address this.

A significant amount of EU legislation impacts our sector. Issues relating to finance, taxation, fair competition, investment, energy, sustainability, services of general interest and professional services are at the forefront of the Commission's agenda today. Recommendations in the Annual Growth Surveys and country-specific recommendations as part of the European Semester touch both directly and indirectly on policies impacting the real estate sector. However the approach of EU policy development for the sector is neither strategic nor coherent. **We would like to work with the new Commission to change this and set out a clearer narrative and goals to enable the sector to fully respond to our shared challenges.**

¹ INREV EPRA Real Estate in the Real Economy Summer 2014

² Eurostat real estate activity statistics – NACE Rev.2

We believe that as a first step, leadership on a sector strategy must be identified within the Commission, to provide professionals, industry, the public sector and stakeholders with a central point of contact. Subsequently, this leadership needs to host a truly cross-sector dialogue, building upon existing and previous sector-related initiatives, but aimed at agreeing a more comprehensive and long-term strategy for the real estate sector across the Commission.

To help shape this dialogue, we believe a sector strategy could be structured around the following indicative list of themes that are of universal concern to actors in and affected by the sector:

1. **Financial Opportunities:** The significant value of the real estate sector to the EU economy and its role in the economic recovery.
2. **Job Creation:** The sector's large potential for job creation and the further development and mobility of professional services.
3. **Sustainability:** The full capacity of sustainable buildings to improve occupant health, wellbeing and productivity and make the largest single contribution towards the EU's energy and climate goals.
4. **Market and Regulatory Stability:** The importance of a stable, transparent, balanced and well-functioning real estate market for owners, tenants, investors and professionals in the sector.
5. **Buildings and Infrastructure:** The intrinsic relationship between buildings, urban and rural development and critical infrastructure such as transport and energy.

A healthy and well-functioning real estate sector is important for jobs, growth and investment as well as mobility. Its complexity and scale requires a coherent and well-informed approach by European legislators. We call for an ambitious and strategic and long-term approach to the real estate sector in the EU that recognises the importance and diversity of the sector, and which results in coordinated policy measures that support sustainable economic growth, whilst respecting the principles of subsidiarity.

We recognise cooperation between the sector's diverse actors is key to the development of coherent and strategic policy. Therefore, as representative bodies in the sector, we request a meeting with you to introduce the shared views of a diverse group of organisations which are all able to find common ground in their call for an EU real estate sector strategy.

Yours sincerely,

The 41 signatory associations

Return addresses:

RICS - 12309911354-39
Mr. Sander Scheurwater
Rue Ducale 67
B-1000 Brussels

sscheurwater@rics.org
+32 (0)2 739 42 28

CEPI-CEI - 1094652600-90
Mr. Xavier Ortegat
Avenue de Tervueren 36 bte 2
B-1040 Brussels

xavier.ortegat@cepi.eu
+32 (0)2 735 49 90

The signatories




This letter has been signed by 41 associations, listed below. The members of our different organisations are involved in commercial and residential real estate (including private and social rental housing) as well as construction as representatives of professionals, owners, tenants, investors, NGOs, individuals and the construction industry, including micro enterprises, SMEs and large firms. Next to European and international associations, this letter is supported by national associations from Belgium, Bulgaria, Cyprus, Finland, France, Germany, Ireland, Italy, Luxembourg, The Netherlands, Poland and the United Kingdom. Collectively we firmly believe that it is time to give the real estate sector as a global sector attention as a matter of priority at European level.

European & International associations	
	<p>RICS (12309911354-39) is a global professional body. We promote and enforce the highest professional qualification and standards in the development and management of land, real estate, construction and infrastructure. Our name promises the consistent delivery of standards – bringing confidence to the markets we serve. The work of our professionals creates a safer world: we are proud of our profession’s reputation and we guard it fiercely.</p>
	<p>CEPI-CEI (1094652600-90) groups 32 national associations and represents over 250.000 real estate professionals in the EU and EFTA countries. Its objective is to voice the interests of the real estate sector and professions to the European institutions, improve market knowledge, strengthen working relationships between professionals, and oversee their professional ethics, professional practices and quality of education.</p>
	<p>The Concrete Initiative wishes to engage with stakeholders on the issue of sustainable construction, and in particular the barriers and solutions to harness its multiple benefits. The project is led by CEMBUREAU (the European Cement Association - 93987316076-63), BIMB (the European Federation of Precast Concrete - 07055806769-32) and ERMCO (the European Ready-Mixed Concrete Organisation - 15077947344-66).</p>
	<p>Construction Products Europe AISBL (48010783162-91) represents the interests of all European construction products manufacturers, from SMEs to multinational companies. Construction Products Europe was established in 1988 as an AISBL, a non-profit making organisation under Belgian law.</p>
	<p>The Commercial Real Estate Finance Council (CREFC) Europe (050415314994-69) is the trade association for commercial real estate (CRE) lenders and debt investors in Europe. Our work covers best practice, education and regulatory engagement, as we seek to improve transparency, understanding and diversity in a sustainable and successful European CRE debt market.</p>



	<p>The European Association of Homes and Services for the Ageing, (EAHSA) (81317437623-13) is the European integral platform of the providers of housing, services and care for the ageing sector. Members represent all types of organisations and individuals active for older persons and all types of ownership including for profit, not-for-profit and governmental organisations.</p>
	<p>The European Builders Confederation EBC (09256701147-51) is the European organisation representing national associations of micro, small and medium-sized enterprises working in the construction sector. EBC was established in 1990 to represent exclusively the 2 million construction SMEs active in the associated Member States. 92% of the European construction sector is composed of micro-enterprises with less than 10 operatives. EBC is a member of the European association of crafts and SMEs, UEAPME.</p>
	<p>European Council of Civil Engineers (ECCE) (477439913758-17) was created in 1985 out of the common concern of the professional bodies for Civil Engineers in Europe that the Civil Engineers working together across Europe could offer much more for the sustainable development and the quality of life of the European Citizens putting forward reliable, safe, economical and environmentally, socially acceptable solutions for the constructions and infrastructure.</p>
	<p>Created in 1972, The European Landowners' Organization (ELO) (36063991244-88) promotes a prosperous and attractive European Countryside. ELO is a unique federation of national associations from the EU28 and beyond which represents the interests of landowners, land managers, rural entrepreneurs and family businesses. It targets its actions on land use and housing, via seven major areas of European importance: environment, renewable energy, agriculture and rural development, status of private property and companies, forest, enlargement and trade.</p>
	<p>The European Masonry Alliance is an alliance of European masonry product sector associations (brick & blocks/elements and mortar). As group the Alliance is the cornerstone of the housing sector, providing 2 million homes for European citizens every year and employment to more than 300.000 professionals. Its members are BIBM (Federation of the European Precast Concrete Industry - 07055806769-32), EAACA (European Autoclaved Aerated Concrete Association - 899865010107-44), ECSPA (European Calcium Silicate Producers Association - 977117061899-40), EMO (European Mortar Industry Organisation) and TBE (Tiles and Bricks Europe - 7705861978-33).</p>

	<p>Established in 1967, the European Mortgage Federation (EMF) (24967486965-09) is the voice of the European mortgage industry, representing the interests of mortgage lenders at European level. The EMF provides data and information on European mortgage markets, which were worth over €6.7 trillion at the end of 2013. As of March 2015, the EMF has 18 members across 14 EU Member States as well as a number of observer members.</p>
	<p>In 2004 the EMF (See above) founded the European Covered Bond Council (ECBC) (24967486965-09), which is a platform that brings together covered bond market participants including covered bond issuers, analysts, investment bankers, rating agencies and a wide range of interested stakeholders. As of March 2015, the ECBC has over 100 members across 25 active covered bond jurisdictions and many different market segments. ECBC members represent over 95% of covered bonds outstanding, which were worth over €2.6 trillion at the end of 2013.</p>
	<p>The European Network for Housing Research (ENHR) was established in 1988 to provide an organizational platform for institutions and individuals in (and outside) Europe, who are actively engaged in housing research. It now has about 1000 individual and nearly 100 institutional members representing almost every country in Europe. Although ENHR is an European network, researchers from outside Europe are also very welcome to join.</p>
	<p>The European Public Real Estate Association (EPRA) (09307393718-06) is the voice of the publicly traded European real estate sector. With more than 200 active members, EPRA represents over EUR 300 billion of real estate assets and 90% of the market capitalisation of the FTSE EPRA/NAREIT Europe Index. Through the provision of better information to investors, improvement of the general operating environment, encouragement of best practices and the cohesion and strengthening of the industry, EPRA works to encourage greater investment in listed real estate companies in Europe.</p>
	<p>The EuroFM network organization has its members situated in 23 different countries in Europe. Representing more than 80.000 people actively involved in FM. Our member organizations include research institutes, universities, commercial organizations and national FM related associations. As a network organisation the main mission of EuroFM is to progress the advancement about the knowledge of FM in Europe and the application of its three main pillars, Practice, Education and Research.</p>
	<p>FEANTSA (42528706153-39), the European Federation of National Organisations working with the Homeless, was established in 1989 as a European non-governmental organisation to prevent and alleviate the poverty and social exclusion of people threatened by or living in homelessness. It is the only major European network that focuses exclusively on homelessness. FEANTSA currently has more than 130 member organisations, working in close to 30 European countries, including 25 EU Member States.</p>

 <p>WORLD GREEN BUILDING COUNCIL</p>	<p>The World Green Building Council (482897410370-35) is a coalition of over 100 national Green Building Councils and 27,000 members around the world, making it the largest international organisation influencing the green building marketplace. Our Europe Regional Network consists of over 30 national Green Building Councils and works in collaboration with more than 5,000 member companies across Europe, which represent the full breadth of stakeholders in the buildings industry.</p>
 <p>Habitat for Humanity® Europe, Middle East and Africa</p>	<p>Habitat for Humanity International's vision is a world where everyone has a decent place to live. As a global NGO, in the EU we are active in 11 member states. Our main focus in Europe: housing microfinance services; building and repairing homes for low income families with the help of volunteers; disaster risk reduction and response; residential energy efficiency and the housing of vulnerable groups, especially the Roma.</p>
 <p>HOUSING EUROPE</p>	<p>Housing Europe (0124622797-55) is the European Federation of Public, Cooperative Social Housing. Established in 1988, it is a network of 42 national and regional federations which together gather about 41.400 public, social and cooperative housing providers in 22 countries. Altogether they manage over 25 million homes, about 12% of existing dwellings in the EU. Social, public and co-operative housing providers have a vision of a Europe which provides access to decent and affordable housing for all in communities which are socially, economically and environmentally sustainable and where everyone is enabled to reach their full potential.</p>
 <p>INREV</p>	<p>INREV (47748145557-46) is the European Association for Investors in Non-listed Real Estate Vehicles. Since its launch in 2003, it has grown to more than 350 members from more than 28 different countries. INREV's aim is to improve the accessibility of non-listed real estate funds for institutional investors by promoting greater transparency, professionalism and standards of best practice. INREV is led by institutional investors and supported by other market participants such as fund managers, investment banks, academics, lawyers and other advisors. As a pan-European body, INREV represents a unique platform for sharing knowledge on the non-listed real estate funds market.</p>
 <p>IUT</p>	<p>Since the foundation of IUT (International Union of Tenants) (94035285059-91), in 1926 in Zürich, Switzerland, IUT has been dedicated at safeguarding tenant's rights, as well as promoting construction and access to affordable rental housing. IUT believes that every well-functioning society is better off with a mix of rentals and ownership housing. IUT promotes secure tenure and tenant's rights, which is not the case in many countries. IUT also promotes "tenure neutrality"; modes of finance and taxation should not distort consumer choices between renting and owning. IUT is a membership based organisation with 65 members in 46 countries around the world."</p>

	<p>The European Union of Developers and House Builders (UEPC) (80003592094-64) is the umbrella organisation for national federations of Developers and House Builders. UEPC is a European association representing more than 30,000 developers and house builders affiliated to the federations of 10 states (Germany, Belgium, Spain, France, Malta, Norway, The Netherlands, Poland, Romania and United Kingdom). The main aim of UEPC is to support and defend the interests of developers and house builders in Europe.</p>
	<p>The International Union of Property Owners (UIPI) (57946843667-42) is a pan-European not-for-profit association comprising 30 organisations from 28 countries. Jointly, they represent more than 5 million private property owners and some 20 to 25 million dwellings. Founded in 1923, the UIPI aims at protecting and promoting the interests, needs and concerns of private landlords and owner-occupiers at national, European and international levels. The UIPI is involved in many issues, including general housing; taxation and inheritance concerns; technical matters and new regulations such as energy saving in buildings; the private rented agenda; as well as universal consumer rights and social responsibilities.</p>
	<p>L'Union Social Pour l'Habitat (USH) (51553694127-62) brings together professional agencies from the social housing and urban development sectors in French speaking countries.</p>

National Associations

Belgium	
	<p>IFMA Belgium is one of the 130 chapters of IFMA international, uniting 24,000 members in 94 countries. IFMA Belgium is a professional body representing over 5,500 professionals active in Facility Management and Facility Services.</p>
Bulgaria	
	<p>The Bulgarian Facility Management Association (BGFMA) was established in 2008. With more that 50 members today, the goals set-up by the association, are uniting people and companies, which work in the field of facility management; development of the know-how and professional qualities of facility managers, popularizing and increasing the prestige of the facility manager profession in Bulgaria and the region.</p>

Cyprus



Our organisation **ΣΕΕΟΚΚ** is the local association of professional Quantity Surveyors, with our main goal being to promote the profession in Cyprus, ensure professional standards of our members, to provide guidance to future members and advise the local technical chamber on all matters relating to our profession.

Finland



RAKLI is the **Finnish Association of Building Owners and Construction Clients**. RAKLI's members include Finland's most prominent owners of residential and commercial properties and infrastructure, tenants of commercial facilities, property investors, building contractors and service providers.

France



The **Association Française des Sociétés de Placements Immobilier (ASPIM)** represents the France-based investment management industry for Real Estate Non-Listed Funds. Our members include 49 management companies. They are entrepreneurial or belong to French or foreign banking or insurance groups. ASPIM members are managing 60 billion euros in the field of investment management in the industry of real estate non listed funds and representing 600.000 investors, making in particular the French industry one of the leaders in Europe in terms of financial management location for collective investments in real estate."

Germany



bsi Bundesverband Sachwerte und Investmentvermögen e.V. (Real Asset Investment Association) (83251852142-10) is an interest group for all companies that manage real assets with activities directly related to the provisions of the AIFMD regime and the German Capital Investment Code (KAGB). Members range from capital management companies, asset managers, depositaries and outsourcing companies to legal, fiscal and business consultants.



ZIA (34880145791-74), the German Property Federation (Zentraler Immobilien Ausschuss e.V.), represents German real estate business in its entirety. ZIA speaks on behalf of 180 individual member firms and 25 member associations, thus representing 37,000 branch members.

Ireland



The **SCSI** is the largest professional body for the construction, property and land sectors in Ireland. Operating in the public interest, we work in partnership with RICS to promote high standards in the sectors in Ireland.

Italy



AREL (Associazione Real Estate Ladies) was established on 19 July 2006 with the aim to be a point of reference and a space within sharing experience and knowledge to the women working in Italian real estate industry. Today it consists of about 250 members.

AREL Associazione Real Estate Ladies promotes workshop, conferences focusing on themes across the entire real estate investment cycle. Moreover, AREL Associazione Real Estate Ladies is focused in enhancing and developing the awareness of role of women with particular respect to real estate sector.



The **Italian Real Estate Industry Association Assoimmobiliare**, a member of Confindustria, chaired by Aldo Mazzocco and managed by Paolo Crisafi, is the main representative organization for companies working in finance and providing real estate services. It seeks to contribute to the country's economic growth and to the consistent and sustainable development of national territory, representing the proposals of the real estate system before the main political and administrative institutions and other social partners.

Luxembourg



The Association of the Luxembourg Fund Industry (ALFI) (6182372280-83) is the representative body of the Luxembourg investment fund community. Created in 1988, the Association today represents over 1,300 Luxembourg domiciled investment funds, asset management companies and a wide range of service providers such as depositary banks, fund administrators, transfer agents, distributors, legal firms, consultants, tax experts, auditors and accountants, specialist IT providers and communication companies. The Luxembourg Fund industry is the largest fund domicile in Europe and a worldwide leader in cross-border distribution of funds. Luxembourg-domiciled investment structures are distributed on a global basis in more than 70 countries with a particular focus on Europe, Asia, Latin America and the Middle East.

The Netherlands

vereniging van
woningcorporaties



Aedes (65780747925-05) is the Dutch association of social housing organisations. Its members provide housing to 2.4 million households. They are not-for-profit real estate companies and service providers, working independently at their own risk and expense. They supply social and affordable housing services. This includes contributing to the quality of living in communities, care arrangements for the elderly and helping special needs groups, such as mentally or physically disabled and asylum seekers. Aedes is Member of [Housing Europe](#) and signatory of the [ERHIN Declaration](#)



Vereniging van
Institutionele Beleggers
in Vastgoed Nederland

IVBN is the **Association of Institutional Property Investors** in The Netherlands. Our members are real estate asset managers, working predominantly for pension funds, insurance companies, banks, and real estate funds and companies (listed and non listed). IVBN's members jointly represent around €50 billion investment in Dutch property and about the same amount outside of the Netherlands. They invest in housing, offices, retail and industrial objects and other property, including car parks. The institutional investors are the primary lessor of commercial property in the Netherlands.

Poland



**POLSKA RADA
CENTRÓW HANDLOWYCH**
POLISH COUNCIL
OF SHOPPING CENTRES

The **Polish Council of Shopping Centres (PRCH)** is a not-for-profit association that represents more than 200 entities (developers, retailers, service providers, investors) operating on the commercial real estate market in Poland. The Council was established in 2003. Our mission is to support the development of businesses and professionals operating and working in Poland's commercial property market and to promote a positive image of shopping centres and shopping streets.

United Kingdom



The **Association of Real Estate Funds (AREF)** (5804781152-61) is the voice of the real estate funds industry in the UK. We aim support the real estate industry by ensuring that members offer consistently high quality products and support services to investors and their advisers, by enhancing the understanding of real estate funds and through our governance and transparency standards, and by encouraging the evolution of our industry by promoting debate, arranging or sponsoring events, and commissioning research. Collectively our members manage about €75 billion on behalf of their clients."



The **British Property Federation (BPF)** is the voice of property in the UK, representing businesses owning, managing and investing in property. This includes a broad range of businesses, comprising commercial property developers and owners, financial institutions, corporate and local private landlords and those professions that support the industry, including law firms, surveyors and consultants.



The **Investment Property Forum (IPF)** is the leading UK property investment organisation for individual members. It comprises an influential network of approximately 2,000 senior professionals, including investment agents, fund managers, bankers, lawyers, researchers, academics, actuaries and other related professionals, all active in the property investment market. The IPF's objective is to enhance the understanding and efficiency of property as an investment, including public, private, debt, equity and synthetic exposure, for its members and other interested parties, including government by undertaking research and special projects and ensuring effective communication of this work.