

EPBD timeline for real estate: from policy to practice

Introduction

The Energy Performance of Buildings Directive (EPBD or the Directive) represents a cornerstone of the European Union’s strategy to improve energy efficiency and reduce carbon emissions within the real estate sector. Since its inception, the EPBD underwent several revisions to align with evolving climate targets, technological advancements, and the need for greater energy efficiency across Member States (MS).

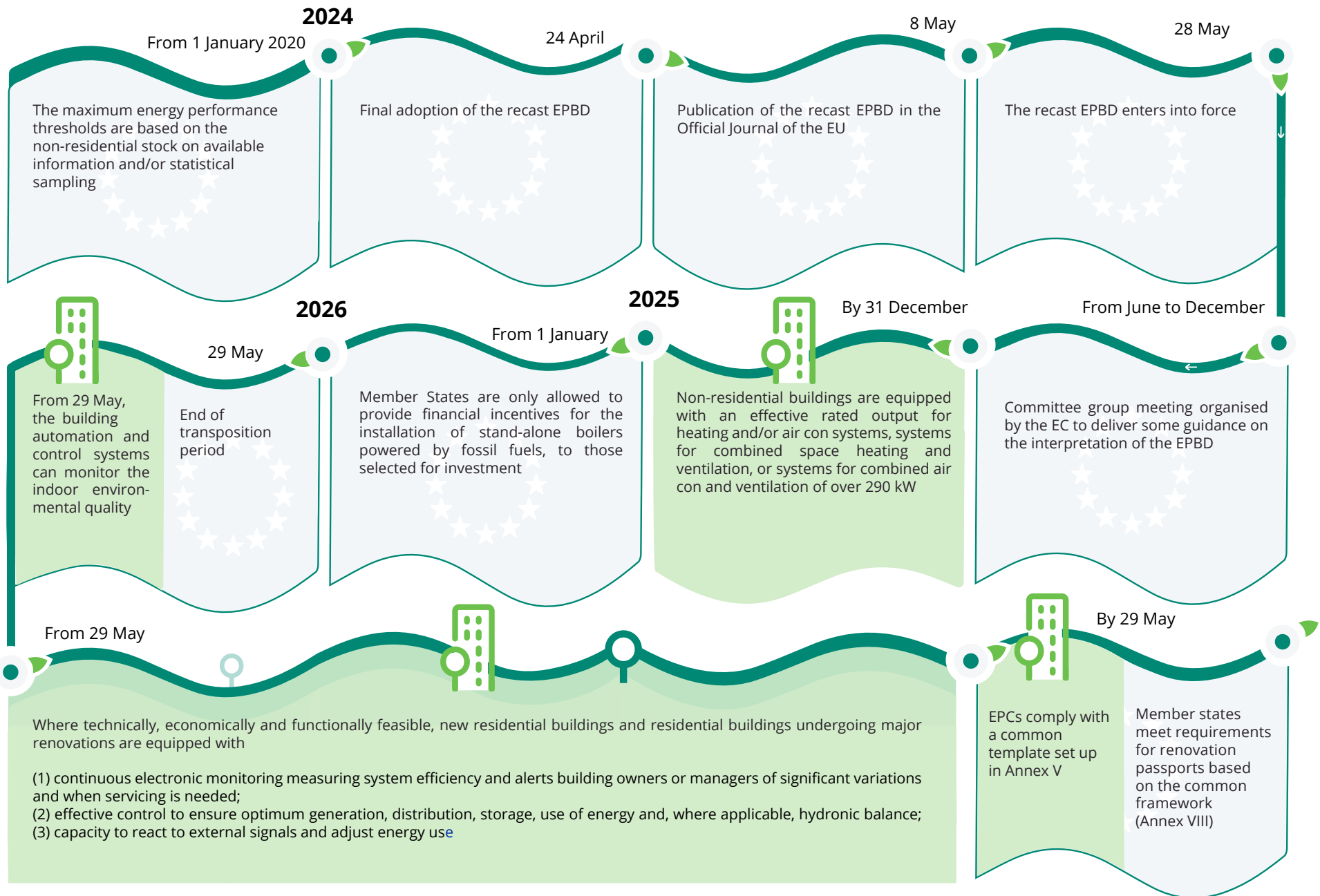
The latest recast of the EPBD, adopted in April 2024, reflects the EU’s intensified focus on achieving carbon neutrality by 2050 and addresses emerging challenges such as digitalisation, energy poverty, and the integration of renewable energy systems.

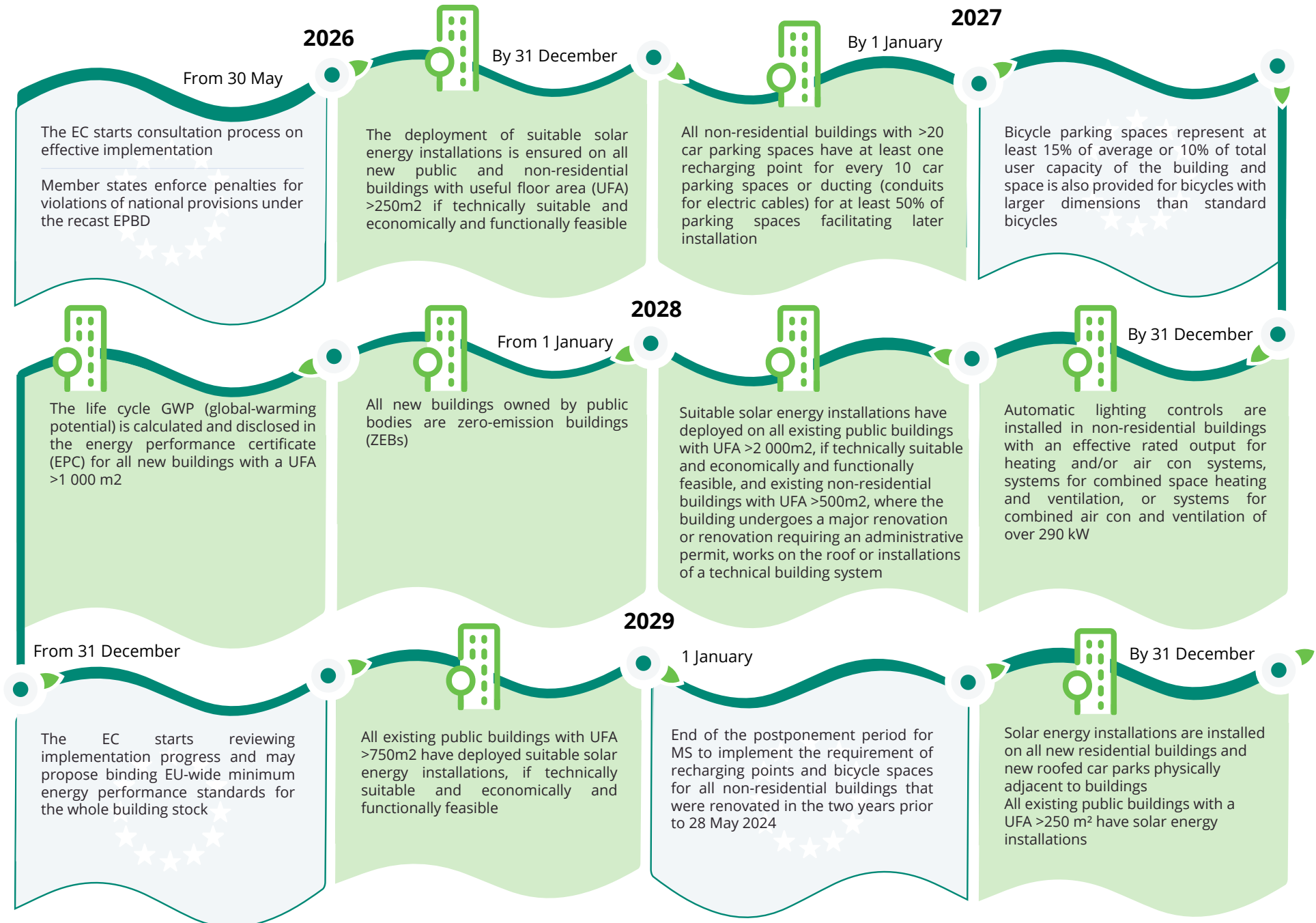
The revised EPBD introduces new and more stringent requirements for the energy performance of buildings, aiming to accelerate the decarbonisation of the building stock across all EU member states.

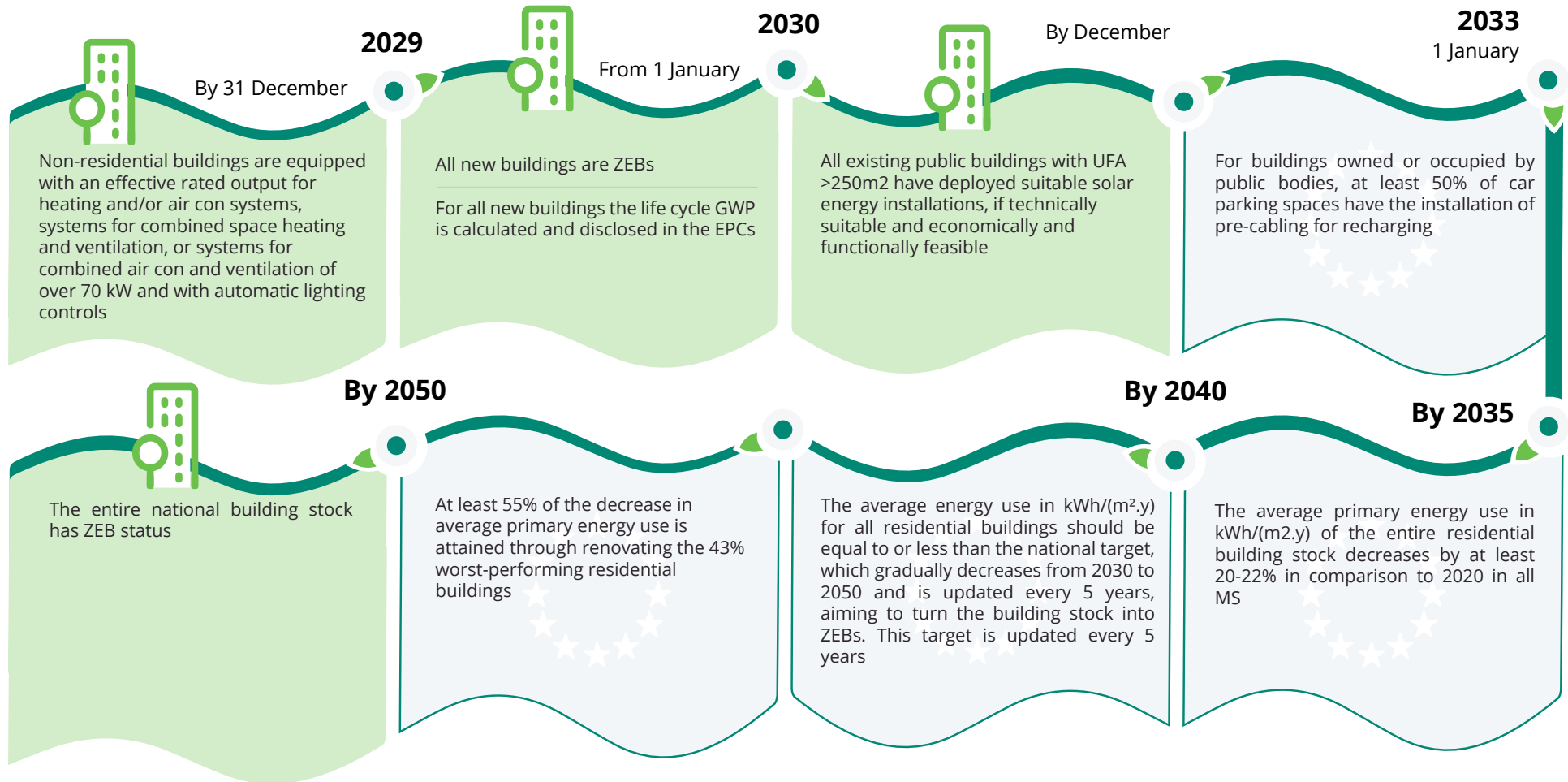
This paper presents a detailed timeline for the implementation of the EPBD, outlining key milestones, deadlines, and the responsibilities of the European Commission (EC) and MS in enforcing and transposing the directive.

By providing a comprehensive overview of the implementation process, stakeholders can gain insights into the expected pace of policy implementation, as well as the specific actions required at both the EU and national levels.









European Commission commitments under EPBD

The European Commission has several responsibilities under the recast EPBD, involving, e.g., the issuance of delegated and implementing acts, reports and recommendations. It is continuously tasked with providing guidance, sharing evidence on existing national policies, and offering technical support to Member States upon request. Some of the above, such as implementing acts, require presenting a consultation strategy outlining objectives, targeted stakeholders, and activities.

To keep the Directive relevant and effective, from **30 May 2026**, the Commission can update the technical aspects of the methodology used to determine the building's energy performance, e.g. air-conditioning installations, as outlined in Annex I, point 4 EPBD. Additionally, the Commission can amend aspects that positively influence energy performance of buildings, such as active solar systems or thermal storage systems, as detailed in Annex I, point 5, EPBD.

The Commission is tasked with revising the comparative methodology framework for calculating cost-optimal levels of minimum energy performance requirements by **30 June 2025**. This revision would apply to new buildings, existing buildings undergoing major renovation, and individual building elements. By **30 June 2026**, the Commission may also issue country-specific recommendations to Member States, based on the first draft of their national building renovation plans. Additionally,

the EC may publish a report on Member States' progress in achieving cost-optimal levels of minimum energy performance requirements, although, there is no set deadline for this report.

By **31 March 2025**, the Commission must perform an analysis for the Council and the European Parliament with regards to funds, framework programmes and other measures that could stimulate the investment in the energy performance of buildings. This analysis should cover the effectiveness and appropriateness of funds used from structural fund and, Union framework programs, funds from public finance institutions and the coordination of Union and national funding.

The Commission is required to supplement the Directive with an optional common EU scheme for rating the smart readiness of buildings. This rating would be based on the assessment of a building's ability to adapt its operations to meet occupant needs, improve energy efficiency, and enhance overall performance, particularly concerning indoor environmental quality and grid interaction. By **30 June 2026**, the Commission must submit a report to the European Parliament and the Council, summarising the results of national test phases and other relevant projects related to the smart readiness indicator. Based on this report, the Commission is tasked with adopting a delegated act by **30 June 2027**, making the application of this scheme required for non-residential buildings with heating,

air-conditioning, or ventilation systems exceeding 290 kW in output. Furthermore, the Commission must adopt implementing acts to detail the technical arrangements for the effective implementation of the scheme, including timelines for non-committal national test phases and clarification of how the scheme complements existing energy performance certificates.

It is up to each member state to decide on appropriate financing, support measures, and other necessary instruments to transform their building stock into zero-emission buildings by 2050. However, the Commission must establish a comprehensive framework on increasing lending volumes for energy renovations by **29 May 2025**. This framework would be available for voluntary use by financial institutions. It aims to support lenders to align their lending practices with the Union's decarbonisation goals and energy targets. The framework would also outline best practices to encourage lenders to identify and address the worst-performing buildings in their portfolios.

Member States commitments under EPB

Under the revised Directive member states are required to adhere to a series of deadlines and reporting obligations as part of their building renovation plans, energy performance targets, and overall strategies for reducing energy use and emissions.

Every five years member states are expected to submit to the European Commission a draft national building renovation plan using the template provided in Annex II of EPBD. The first draft is expected by **31 December 2025**, followed by the final version the year after. The plan covers, i.a. a detailed overview of the national building stock, thresholds of new and renovated ZEBs and minimum energy standards for non-residential buildings.

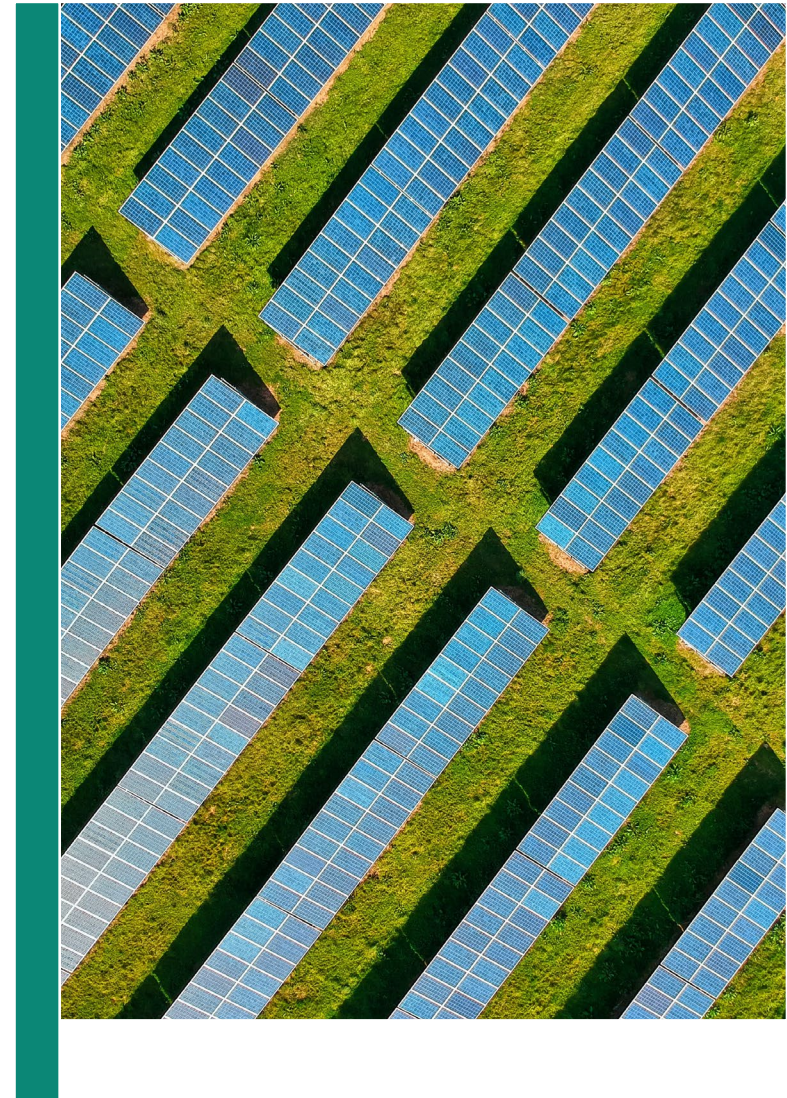
As part of the national building renovation plans, by 29 May 2026, member states are also expected to outline national trajectories for the progressive renovation of the residential building stock. Such trajectories must align with national roadmaps and the targets set for 2030, 2040, and 2050, with the ultimate goal of transforming the national building stock into a zero-emission one by **2050**.

Furthermore, by **1 January 2027**, Member States must publish and notify the EC of a roadmap that details the introduction of limit values on the total cumulative life-cycle Global Warming Potential (GWP) of all new buildings and sets targets for new buildings starting from **2030**.

To achieve energy use reduction targets, by **2030**, member states must ensure that the average primary energy use (in kWh/m².y) of the entire residential and non-residential building stock is reduced by 16% compared to 2020 levels. By **2033**, the reduction target for the non-residential building stock increases to 26%.

Regarding energy performance reporting and rescaling, Member States must, by **30 June 2028**, report to the EC all input data and assumptions used for calculating cost-optimal levels of minimum energy performance requirements, along with the results of those calculations. For member states that have rescaled their Energy Performance classes between 1 January 2019 and 28 May 2024, they may postpone further rescaling until **31 December 2029**.

Finally, member states have ongoing obligations to report on the cost-optimal levels of minimum energy performance requirements. Subsequent reports follow every 5 years, starting with a deadline of **30 June 2028**.



Annex: definitions

The **building automation and control systems** should be capable of:

- (a) continuously monitoring, logging, analysing and allowing for adjusting energy use;
- (b) benchmarking the building’s energy efficiency, detecting losses in efficiency of technical building systems, and informing the person responsible for the facilities or technical building management about opportunities for energy efficiency improvement;
- (c) allowing communication with connected technical building systems and other appliances inside the building, and being interoperable with technical building systems across different types of proprietary technologies, devices and manufacturers;
- (d) by 29 May 2026 monitoring of indoor environmental quality. (Art. 13, §10)

The **global warming potential (GWP)** over a building’s whole life cycle indicates the building’s overall contribution to emissions that lead to climate change. It brings together greenhouse gas emissions embodied in construction products with direct and indirect emissions from the use stage (Introduction to recast EPBD, pt. 9)

The **maximum energy performance thresholds** should be established on the basis of the non-residential building stock on 1 January 2020, based on available information and, where appropriate, on statistical sampling. Member States shall exclude from the baseline non-residential buildings that they exempt pursuant to paragraph 6 (Art. 9, §1)

A **worst-performing building** falls within the lowest 16% of the national building stock in terms of energy performance, compared to levels on 1 January 2020. Every member state is expected to provide details of the definition in their template for the national building renovation plans. (Art. 9)

A **zero-emission building (ZEB)** is characterised by no on-site carbon emissions production from fossil fuels and very low energy demand. It should adapt its energy use, generation, or storage in response to external signals where feasible. The building’s energy demand must meet national thresholds, which are at least 10% lower than those for nearly zero-energy buildings (NZEB). Additionally, its total annual primary energy use should be covered by renewable or carbon-free sources, or in some cases, energy from the grid that meets national criteria. Operational greenhouse gas emissions must also comply with national maximum thresholds (Article 11)

For other definitions, please refer to Article 2, and further, of the recast Directive on the energy performance of buildings.



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