CLIMATE CHANGE ADVISORY COUNCIL

EU Energy Performance of Buildings Directive

Fact Sheet

Disclaimer: *This series tracks the progress of EU Green Deal legislation, providing point-in-time updates on how each law is being adopted into national law and the implementation status of specific article-level measures. This publication was compiled by the Climate Secretariat who are solely responsible for the content and any views expressed therein. It does not represent the views of the Council.*

EU Energy Performance of Buildings Directive (EU) 2024/1275	
Link	• Directive - EU - 2024/1275 - EN - EUR-Lex • Energy Performance of Buildings Directive • Guidance on the Recast EPBD

Key Dates	• The revised EPBD entered into force on 28th May 2024.
	• Ireland must transpose the Directive into Irish law by 29th May 2026
	• There are three implementation dates in advance of May 2026:
	  ○ From 1st January 2025, Ireland shall not provide any financial incentives for the installation of stand-alone boilers powered by fossil-fuels.
	  ○ Ireland must submit the first draft if its building renovation plan by 31st December 2025
	  ○ By 31st December 2024, non-residential buildings with heating/ventilation/air-conditioning systems over 290kW need to install building automation controls (BACs)

Introduction

The revised Energy Performance of Buildings Directive (EPBD) is a legal framework for the decarbonisation of the European building stock by 2050 with intermediate steps to reduce greenhouse gas emissions and energy consumption by 2030. The EPBD was first adopted in 2010 (2010/31/EU) and ultimately amended by Directive 2024/1275 when it came into force on the 28th of May 2024. The Directive aims to help increase the rate of renovation in the EU, particularly for the worst-performing buildings in each country, and it is also designed to support better air quality, the digitalisation of energy systems and the roll-out of infrastructure for sustainable mobility.

The transposition of the revised EPBD is being coordinated by the Department of Housing, Local Government and Heritage across a number of relevant Departments. While some elements of the Directive can be implemented through existing administrative mechanisms or secondary legislation, others will require primary legislation. Many of the requirements under previous iterations of the Directive have been implemented through Parts L and F of the building regulations. A Memorandum is expected to be brought to government to seek approval to begin drafting the necessary legislation, which in turn will require engagement with the relevant Oireachtas Committee for pre legislative scrutiny[1].

A number of key elements of the Directive are discussed below:

National Buildings Renovation Plan Article 3

Each EU Member State is required to submit a National Buildings Renovation Plan (NBRP) by 31st December 2025. These plans must be updated every five years and are subject to review

[1] Dáil Éireann - 10/Jun/2025 Written Answers Nos. 855-879

and recommendations by the European Commission. The first plan must include a detailed roadmap for achieving a highly energy-efficient and decarbonised building stock by 2050, with specific measures for renovating residential buildings to reduce average energy use.

Each plan must provide an overview of the national building stock, set national targets with measurable indicators and outline policies, investment needs and minimum energy performance standards for non-residential buildings. It must also include thresholds for operational greenhouse gas emissions and primary energy demand for zero-emission buildings, a national trajectory for residential renovations and estimates of expected energy savings and broader benefits such as improved indoor environmental quality.

The 2025 Climate Action Plan States that a roadmap to phase out fossil fuel boilers will be published as part of the plan. As part of the NBRP, Member States are required to indicate their plan to phase out fossil fuels in heating and cooling by 2040. A draft of the plan will be submitted to the European Commission by the end of 2025, following a public consultation, with the final version due by 31st December 2026 in accordance with Article 3. To support this process, the Irish Green Building Council (IGBC), in partnership with the Department of Climate, Energy and the Environment (DCEE), hosted a workshop on 16th July 2025 to assist in the development of Ireland's next National Buildings Renovation Plan[2]. The European Commission published a number of templates to assist Member States to prepare these plans[3].

Zero-Emission Buildings (ZEBs) Article 7(1)

From 1st January 2028, all new public buildings in the European Union must meet zero-emission standards. A zero-emission building is characterised by a very low energy demand, no on-site carbon emissions from fossil fuels and either zero or a very low level of operational greenhouse gas emissions. This requirement marks a significant enhancement over the Nearly Zero Energy Building (NZEB) standards introduced in 2018 and implemented in Ireland in 2019, which required new commercial buildings to achieve an A3 BER and residential buildings a B2 rating, with at least 20% of energy needs sourced from on-site or nearby renewables. The NZEB standards were enforced through updates to Part L of the Building Regulations and substantial investment in NZEB and green skills programmes and services were developed. The zero-emission standard will extend to all new buildings, both residential and non-residential, from 1st January 2030.

Whole-Life Carbon Article 7(2)

From 2030, all new buildings in the EU must calculate and disclose their whole-life carbon emissions which include both operational carbon (from energy use during the building's life) and embodied carbon (from materials, construction, and demolition). This whole life carbon figure, expressed as Global Warming Potential (GWP), must be included in the building's energy performance certificate. This aims to identify the most carbon intensive areas of a building's life cycle and influence adoption of lower carbon materials and processes[4].

[2] EPBD-workshop_findings.pdf
[3] https://energy.ec.europa.eu/news/commission-moves-facilitate-preparation-national-building-renovation-plans-2025-06-02_en
[4] https://www.seai.ie/sites/default/files/2025-04/recommendation-on-irelands-lc-gwp-methodology.pdf

The requirement begins earlier, in 2028, for new buildings with a floor area over 1,000 m^2. By the end of 2025, the European Commission will establish a standard method for calculating GWP and by 1st January 2027, each Member State must publish a roadmap introducing GWP limits for new buildings with targets starting in 2030. These targets must progressively tighten over time and reflect differences in building types. However, buildings with planning permission submitted before these deadlines may be exempt from the new rules. Between April and May 2025, SEAI consulted on the development of Ireland's life-cycle GWP Calculation Methodology and National Embodied Carbon Database of Building Materials as part of the implementation of Article 7(2)[5]. A report on the GWP calculation methodology identified the IGBC's Whole Life Carbon tool as being reasonably well aligned with requirements under the Directive subject to further development and recommendations outlined in the report[6]. In order to calculate life cycle assessments for new buildings, representative data on building materials is required. A report prepared for SEAI provides guidance on the development and maintenance of a national database for common building materials and their embodied carbon emissions to support this[7].

Minimum Energy Performance Standards (MEPS) Article 9(1)

Minimum Energy Performance Standards (MEPS) for non-residential buildings are mandated under Article 9.1 of the revised EPBD. The directive requires that Member States ensure the renovation of the 16% worst-performing non-residential buildings by 2030, increasing to 26% by 2033. In Ireland, the Irish Green Building Council, in collaboration with the Department of Housing, Local Government and Heritage (DHLGH) and the Sustainable Energy Authority of Ireland (SEAI), has proposed a roadmap for transposing these requirements[8]. The first step involves defining and identifying the worst-performing buildings. This will require the development of a national database of non-residential buildings, incorporating Building Energy Ratings (BERs) and actual energy consumption data. It is recommended that BER certificates serve as a baseline, supplemented by statistical sampling and metered energy use across different building typologies. Supporting infrastructure must also be established, including mechanisms to facilitate data sharing and the introduction of renovation passports. Key implementation challenges include the currently low renovation rate of commercial buildings, the limited timeframe for compliance and the lack of comprehensive energy performance data. As BERs are only mandatory for new or rented buildings and are asset-based rather than performance-based, they do not fully reflect operational energy use, complicating the identification of the worst-performing stock.

Renovation of Residential Building Stock Article 9(2)

By 29th May 2026, each Member State must establish a national plan to progressively renovate its residential building stock in line with the goal of achieving a zero-emission building stock by 2050. The plan must include a clear trajectory showing how the average primary energy use of all residential buildings will decrease over time. Specifically, the average energy use must be reduced by at least 16% by 2030 and by 20-22% by 2035, compared to 2020. At least 55% of this reduction must come from renovating the 43% worst-performing residential

[5] https://www.seai.ie/about/consultations
[6] https://www.seai.ie/sites/default/files/2025-04/recommendation-on-irelands-lc-gwp-methodology.pdf
[7] https://www.seai.ie/sites/default/files/2025-04/recommendations-on-development-of-EC-database-of-building-materials.pdf
[8] IGBC-EPBD-MEP-Report-1.pdf

buildings which can consume up to 10-15 times more energy than a zero-emission building[9]. While Member States have flexibility in choosing which buildings to target and which measures to implement, they are not allowed to disproportionally exempt rental properties. Minimum Energy Performance Standards (MEPS) for residential buildings remain optional unlike for non-residential buildings where they are mandatory. Exemptions may apply to protected or historic buildings. Methodologies and data for carrying out these requirements must be reported in the National Buildings Renovation Plan required under Article 3 of the Directive.

Solar Readiness Article 10

By 31st December 2029, all new buildings in Ireland must be "solar ready," meaning they must be designed and constructed to accommodate the installation of solar energy systems. This includes residential and non-residential buildings and new roofed car parks. New public and non-residential buildings greater than 250 m^2 must ensure the deployment of suitable solar installations by 31st December 2026. Existing non-residential buildings where the building undergoes a major renovation or an action that requires an administrative permit for building renovations, works on the roof or the installation of a technical building system and is greater than 500 m^2 must ensure the deployment of suitable solar energy installations from 31st December 2027. There is a phased timeline for ensuring the deployment of suitable solar installations in existing public building depending on floor area sizes, starting from 2027 for building larger than 2,000 m^2, 2028 for buildings larger than 750 m^2 and finally building larger 250 m^2 by 2030. All such installations must be technically, economically and functionally feasible[10]. These requirements are expected to be implemented through updates to the national building regulations, as outlined in a written response from the Minister for Housing on 25th February 2025[11].

Building Renovation Passports Article 12

By 29th May 2026, all Member States, including Ireland, must introduce a Building Renovation Passport scheme. A Building Renovation Passport is a personalised, step-by-step roadmap designed to guide the deep renovation of individual buildings significantly improving their energy performance over time. The scheme will be voluntary unless a Member State chooses to make it mandatory. Passports may be issued alongside a BER and must be prepared by a qualified expert following an on-site visit. The passport will be digital, printable and stored in or accessible via the national energy performance database or a digital building logbook. It will also include a consultation with the expert to help the building owner understand the best path to achieving zero-emission status before 2050. Member States are encouraged to provide digital tools to support the creation and updating of passports and to consider financial support to make them affordable, especially for vulnerable households. The IGBC, with support from SEAI, undertook a feasibility study on introducing building renovation passports in Ireland and found that they empowered and motivated homeowners to undertake renovation actions but must be linked with supporting financial and regulation measures and integrated with the BER system[12].

---

[9] Recast Energy Performance of Buildings Directive: What does this mean for the residential sector? - Housing Ireland Magazine

[10] fd6f89fe-711b-4025-bc37-76b99baaa3fe_en

[11] Housing Provision: 25 Feb 2025: Written answers (KildareStreet.com)

[12] Building Renovation Passports - Irish Green Building Council

Fossil Fuel Heating Restrictions Article 17(15)

As of 2025, standalone fossil fuel boilers are no longer eligible for public support under Ireland's national retrofit schemes[13], as this element of the Directive was transposed into Irish law through S.I. No. 749/2024 – European Union (Energy Performance of Buildings) Regulations 2024. The SEAI can no longer recommend the installation of new standalone oil or gas boilers when surveying homes for energy upgrades, for example under the Warmer Homes Scheme. Instead, where a heating system upgrade is required as part of a major renovation, SEAI will assess the home's suitability for a heat pump or other renewable heating technologies that comply with the EPBD. If a homeowner declines to install an EPBD-compliant system, SEAI cannot proceed with other insulation works. Homes that were surveyed and recommended for boiler upgrades before 1st January 2025 are not affected by this change and planned works will continue. However, homes that applied before this date but were not surveyed are subject to the new rules[14]. Under the Housing Aid for Older People Grant Scheme[15], costs related to the repair or replacement of existing fossil fuel boilers by qualified contractors remain eligible, including the installation of second-hand boilers. Grants also continue to support non-fossil fuel heating solutions such as electric or biomass systems, where deemed suitable[16]. The administration of these grants is managed by local authorities, which assess eligibility on a case-by-case basis within the scheme's guidelines.

Financial Incentives / Tenant Protections Article 17(7)

A robust framework of financial tools and incentives aimed at accelerating building renovations will be required. Measures are outlined in Articles 17 and 18 of the EPBD and detailed in the Commission's supporting guidance on financial incentives and market barriers[17]. For example, energy efficiency loans, renovation mortgages, energy performance contracting, pay-as-you-save financial schemes and fiscal incentives such as reduced tax rates on renovation works and materials, on-tax schemes, on-bill schemes, guarantee funds, funds targeting deep renovations, funds targeting renovations with a significant minimum threshold of targeted energy savings and mortgage portfolio standards[18]. The Directive also promotes the use of Public-Private Partnerships. Vulnerable households, including those in energy poverty and residents of social housing, are to be prioritised for financial assistance along with safeguards in-place to prevent evictions due to rent increases following energy upgrades. Ireland has several financial incentives to support renovations such as the grants managed by SEAI (Fully Funded Energy Upgrade Scheme, Individual Energy Upgrade grants, One Stop Shops), Vacant Property Refurbishment Grant[19], solar PV grants for households,

[13] Commission Notice on phasing out financial incentives for stand-alone boilers powered by fossil fuels under the recast Energy Performance of Buildings Directive
[14] Grant Payments: 4 Mar 2025: Seanad debates (KildareStreet.com)
[15] Housing Aid for Older People Grant
[16] Grant Payments: 18 Feb 2025: Written answers (KildareStreet.com)
[17] 40f29e74-65a6-4a5d-ad1f-c20d9ff75f04_en
[18] This mechanism is defined in Article 2(39) as 'mechanisms incentivising mortgage lenders to establish a path to increase the median energy performance of the portfolio of buildings covered by their mortgages towards 2030 and 2050.
[19] Vacant Property Refurbishment Grant

commercial properties and agricultural industry (TAMs 3[20]), the Home Energy Upgrade Loan Scheme[21], green mortgages[2223] and a landlord tax relief for retrofitting[24].

Energy Performance Certificates (BERs) Article 19

By 29th May 2026, Energy Performance Certificates, i.e. BERs in Ireland, will need to be enhanced to provide more detail and harmonised across the EU in line with Annex V of the Directive. The updated BERs will include new indicators for both energy use and greenhouse gas emissions, with optional indicators for features such as EV charging points and indoor air quality controls. A new "A to G" scale with be introduced moving from the current "A1, A2... to G" scale in place in Ireland. In the new scale, "A" will represent a zero-emission building and "G" denotes the worst-performing buildings in the national stock. Additionally, there will be an "A+" category that will represent a building that exceeds zero-emission standards by using at least 20% less energy and generating more renewable energy on-site than they consume. The scope of BER requirements will expand to include situations such as lease renewals and major renovations. This rescaling of the BERs must be communicated clearly to avoid confusion amongst homeowners, tenant and industry professionals. Many buildings currently rated as "A" or "B" could receive lower ratings under the new scale which could lead to misunderstandings or concerns around property value and compliance[25]. Guidance materials, updated training for BER assessors and targeted outreach to homeowners will be essential.

One-Stop Shops Article 18

Article 18 of the Directive requires the establishment of technical assistance facilities to provide technical, administrative and financial advice to households, SMEs and public bodies on the energy performance of buildings, with a particular focus on households in energy poverty and on the worst performing buildings. They should provide independent advice on the different stages of retrofit projects. This is linked to Articles 21, 22 and 24 of the Energy Efficiency Directive which refer to provision of advice on renovation projects related to energy efficiency[26]. In Ireland, the 'One Stop Shop' model in place is slightly different in terms of providing a complete package of domestic energy renovations through commercial providers to achieve B2/cost optimal standards and does not include for example step by step renovation advice or guidance for commercial and public buildings. This also does not include access to a network of independent renovation advisors as has been previously recommended by the Irish Green Building Council. A number of different models exist across the EU including municipal or community advisory services[27], with most focusing on residential buildings to date.

Infrastructure for Sustainable Mobility Article 14

---

[20] Solar Capital Investment Scheme
[21] Home Energy Upgrade Loan Scheme - SBCI
[22] Going Green – The Growth in Green Mortgage Financing in Ireland
[23] Best Green Mortgages in Ireland | Compare Interest Rates
[24] Deduction for retrofitting expenditure
[25] New EU energy efficiency law could see government incentivise thousands more homes to renovate
[26] https://energy.ec.europa.eu/document/download/40f29e74-65a6-4a5d-ad1f-c20d9ff75f04_en?filename=Financial%20incentives%2C%20skills%20and%20market%20barriers%20%28Article%2017%29%20and%20one-stop%20shops%20%28Article%2018%29%20-%20annex%202.pdf
[27] https://www.sciencedirect.com/science/article/pii/S0378778821005570#s0025

The EPBD includes a number of requirements in relation to recharging points for electric vehicles, smart and bi-directional charging and bicycle parking spaces which aim to complement requirements under the Alternative Fuels Infrastructure Regulation (AFIR) and Renewable Energy Directive (RED) and accelerate deployment of recharging infrastructure beside residential and non-residential buildings[28].

For new non-residential buildings and those undergoing major renovation (with car parks inside or adjacent to buildings) non-residential buildings with more than five car parking spaces will require at least one EV recharging point for every 5 parking spaces along with pre-cabling for at least 50% of parking spaces. Bicycle parking spaces must be provided to cover at least 15% of average user capacity. By 2027, similar requirements apply to existing non-residential commercial buildings and by 2033, the same will apply for buildings owned and occupied by public bodies. For new residential buildings with more than 3 parking spaces, pre-cabling for EV recharging is required for at least 50% of parking spaces with at least two bicycle parking spaces for each residential unit. Member States are required to simplify processes for installation of recharging points in new and existing residential and non-residential buildings, in particular in relation to consents from landlords or co-owners to install recharging infrastructure.

[28] https://energy.ec.europa.eu/document/download/b1bce3a3-cea5-4ed8-8cf3-a97565b67c28_en?filename=Infrastructure%20for%20sustainable%20mobility%20%28Article%2014%29%20-%20annex%209.pdf