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NATIONAL BUILDING RENOVATION PLANS

HIGHLIGHTS FROM BPIE'S PROGRESS SURVEY



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NATIONAL BUILDING RENOVATION PLANS

The Energy Performance of Buildings Directive (EPBD) recast brought forth changes and improvements for the buildings decarbonisation process, including an improved planning framework: **National Building Renovation Plans (NBRPs)**. According to the EPBD, Member States should submit the first NBRP drafts to the European Commission by 31 December 2025. As part of the process, Member States should conduct public consultations on the draft NBRPs before submission.

BPIE's NBRP progress survey

BPIE has conducted a survey to assess the progress Member States have made on the NBRPs through the collection of responses on (a) public consultations for NBRPs, and the (b) preparation process for drafting NBRPs, with a major focus on the issue of public consultation. The survey included a combination of qualitative and quantitative questions asking **respondents about their attitudes toward progress on the NBRP in their Member State**.

The results are based on **52 responses** from various stakeholders, representing non-governmental organisations (37%), individual companies/businesses (25%), business associations (19%), academic and research institutions (12%), and a few responses from sub-national public authorities. The Member States from which the information was collected include: Austria, Belgium, Bulgaria, Croatia, Czechia, France, Germany, Greece, Hungary, Ireland, Italy, Lithuania, Poland, Portugal, Romania, Slovakia, Spain, Sweden, and the Netherlands. **The responses were collected from mid-July until the beginning of September 2025, and reflect the situation of the NBRPs at that time.**

At present, Member States are at varying stages of NBRP development, and their implementation approaches differ significantly. These differences prevented a qualitative comparison between Member States on specific issues. Respondents from certain Member States highlighted specific good practices that others could replicate, while others highlighted their difficulties with the process.

KEY OBSERVATION

The responses show that, by the beginning of September, the public consultations for NBRPs do not appear to be a priority in many Member States. Some Member States have undertaken certain actions towards public engagement, such as the establishment of a dedicated task force responsible for the development of the NBRP and public consultations. However, more needs to be done to ensure a proper public involvement process. Only a few Member States have taken steps to sufficiently consult the public on their draft NBRP before its submission. This may be an early warning that some Member States will face delays or problems in the quality of the public consultation process, which could affect the quality of the draft NBRP.

NEEDS AND CHALLENGES

Broad-ranging inclusivity in public consultations

In certain Member States, stakeholders said that they did not feel included, while other stakeholders indicated they found inclusion sufficient. This shows that even if certain stakeholder engagement activities were conducted, some activities were only accessible by invitation or only communicated to a small audience. This highlights the need for broader inclusivity in the public consultation process.

Transparent information on the NBRP development process

Some respondents mentioned that their Member States had not shared clear plans or information on the development of the NBRP, including the timeline of the public consultation, leaving stakeholders in the dark. This highlights the need for better planning and transparency with stakeholders.

Capacity in the administrative bodies responsible for NBRPs

Respondents from certain Member States mentioned limited staff capacity within the government bodies responsible for developing the NBRP. As the scope of the NBRPs has increased significantly from the previous iteration of the EPBD, more technical and policy expertise is needed for effective development. This highlights the need for more internal resource allocation and external support for responsible bodies.

Political certainty and continuity

Respondents highlighted that political events, such as elections and government changes, in certain Member States cause disruptions to effective planning and processes needed. Additionally, in other Member States, constructive collaboration with regional governments led by political parties opposed to green legislation can be challenging.

POSITIVE EXAMPLES

Spain's pre-public consultation and streamlined co-creation

Spain conducted a pre-public consultation in April 2025 without the initial NBRP draft, with official consultations expected by the end of the year based on the initial NBRP draft.

Spain's pre-public consultation process involved feedback collection through online submission of responses and through events with numerous stakeholders involved. The process involved various groups: **5 expert groups** dedicated to certain focus areas (finance and business models, renovation management, industrialisation and innovation, non-residential buildings and energy poverty), which collected opinions and produced reports on their topics; **4 working groups** dedicated to different levels of governance and sector interests (Interministerial, Autonomous Communities, Local Entities, Sector Agents), that meet regularly.

Spain's pre-public consultations and the involvement of expert and working groups show good inclusivity and streamlined co-creation. Learn more about Spain's approach: [NBRP dedicated website](#), [pre-public consultation webpage](#), [BUILD UP article](#).

Poland's pre-public consultation and initial NBRP availability

Poland conducted a pre-public consultation from late December 2024 until 13 January 2025, with the **initial draft NBRP available**. The official consultation is expected to open by the end of the year. During the pre-public consultation, 187 comments from 17 organisations were received, and a follow-up meeting with stakeholders was conducted to summarise the outcomes. Poland has indicated openness to receiving further comments after the pre-consultation deadline.

Poland's pre-public consultation, done with the availability of the initial NBRP draft, gave stakeholders an early opportunity to familiarise themselves with the draft before the official public consultation took place. More about Poland's approach: [pre-public consultation webpage](#), [BUILD UP article](#).

FURTHER RECOMMENDATIONS

BPIE's report '[Delivering the EPBD: A guide towards better, affordable and more resilient buildings for all in Europe](#)', includes recommendations and good practices for the implementation of the EPBD recast. The report specifies 3 areas for Member States to consider when organising a strong public consultation for NBRPs, based on the assessment of the previous 2020 long-term renovation strategies:

Openness and transparency

Reaching stakeholders through multiple engagement channels and methods. This should include the availability of online feedback mechanisms, scalable to a wider audience, such as submission through a dedicated webpage promoted on social media. Online and in-person public events, such as public hearings, stakeholder roundtables and workshops can also help ensure constructive discussions. Accountability to the public is of strong importance, through follow-up and summaries of the outcomes of public consultations.

Inclusivity

Engage a broad range of stakeholders in the development of NBRPs to create an inclusive societal consensus through co-creation. This should be done through the identification and mapping of relevant stakeholders, which includes those explicitly mentioned by the EPBD and those which are not. While approaches to identification may vary depending on Member States, three groups can be outlined: socioeconomic partners representing business and industry, socioeconomic partners representing citizens and households, and sub-national public authorities. The consultations should strike a balance between technical expertise and accessible, easy-to-understand information, and ensure the inclusion of vulnerable people.

Effectiveness

Consider a proper process and timing for public consultations that will guarantee effective feedback-gathering and dialogue on concrete policy design options. The process should involve announcements and awareness-raising in advance, early dissemination of the initial NRP draft, a public consultation with sufficient time for feedback, and dedicated time for the responsible authority to integrate the feedback. Each activity should have a sufficient timeframe.

BPIE's report '[Delivering the EPBD: A guide towards better, affordable and more resilient buildings for all in Europe](#)' provides recommendations to support the NRP process, including information and good practices on public consultations and the administrative set-up for NRP drafting and implementation, coordination with other planning instruments and the content of the NRP (see Chapter 1.2, 'National building renovation plans: a strategic compass to direct action').