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Bringing European Building Policy to Life

# Energy Performance Certificates: Development of EPC Policy Guidelines for Poland

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# CONTENTS

# EXECUTIVE SUMMARY

This document presents key policy measures and recommendations for energy performance certificates (EPCs) in Poland, within the framework of the EPBD.wise project. The overarching aim is to improve energy efficiency in the building sector, focusing on compliance, methodology refinement and digitalisation to align with national and EU objectives, based on the Energy Performance of Buildings Directive (EPBD).

The methodology used for each focus country was to first identify its policy needs, the types of intervention called for, and the priorities and policy measures required to address them. For Poland's EPC system, policies are needed on communications and perception, quality control, recommendations and rescaling.

Key recommendations for Poland are as follows:

- Strengthen EPC quality control with independent verification, automated compliance checks, strict professional standards for assessors, penalties for non-compliance, and third-party oversight.
- Modernise the EPC database: integrate multiple data sources, enable easy digital and interoperable access, and ensure regulated access for all relevant users.
- Make EPC recommendations more detailed, costed, and renovation-focused.
- Integrate the smart readiness indicator to assess energy and smart features.
- Promote communications campaigns on EPCs, savings, and one-stop-shops.
- Simplify the design of the EPC with user-friendly digital tools.
- Communicate energy consumption more clearly by using final energy for communication and primary energy for calculation.

## List of abbreviations and acronyms

| | |
|---|---|
| **DBL** | Digital Building Logbook |
| **DGEG** | Directorate General for Energy and Geology |
| **EPBD** | Energy Performance of Buildings Directive |
| **EPC** | Energy Performance Certificate |
| **GHG** | Greenhouse Gas |
| **HES** | Home Energy Scotland |
| **MEPS** | Minimum Energy Performance Standards |
| **MS** | Member State |
| **NBRP** | National Building Renovation Plan |
| **NZEB** | Nearly zero-energy building |
| **OSS** | One-stop shops |
| **RP** | Renovation Passport |
| **ZEB** | Zero-Emission Building |

## List of figures



## List of tables

1

# INTRODUCTION

## 1.1 Scope and objectives of the deliverable

This deliverable focusses on specific policy guidelines for each of the focus countries for which national partners defined EPCs as a priority under the EPBD.wise framework: these are Bulgaria, Greece, Hungary and Poland. The main objective is to assess different options for improving the EPC schemes in these countries under the new Energy Performance of Buildings Directive (EPBD) requirements. This assessment is based on the extensive work carried out in previous EPBD.wise tasks, namely the mapping of policy needs for each country and the identification of good practices in a wide range of topics such as communication and perception, quality control, expert training and qualification, database use and calculation methodologies, among others. The policy guidelines will consider different approaches based on best practice examples and the specific conditions in the target countries, reflecting the current status of their EPC systems along with any ongoing or planned modifications.

This document focuses on Poland, and provides detailed policy guidelines for the development and improvement of its EPC system under the EPBD framework.

An initial attempt to define priority action plans is also developed by pinpointing priority interventions selected from the range of policy guidelines. Each roadmap outlines the steps required, ensuring a clear and actionable path forward as well as defining the specific stakeholders and their roles in this process.

The main aim of this deliverable is to match policy objectives with policy needs and mandates, particularly focusing on the EPBD. Specific policy needs can be addressed more effectively by leveraging the  transposition of the EPBD. They will also be grouped to streamline the process and prepare the ground for replication.

## 1.2 Structure of the deliverable

Besides this introductory chapter which outlines the objective's structure and links with other policy elements of the EPBD, there are three main sections in this deliverable:

The methodology section describes the approach used to develop the Policy Guidelines, including the methods used to collect and analyse data. It then focuses on the policy needs and the current implementation status of EPCs in Poland.

Next, the document presents EPC policy guidelines for Poland. It outlines the opportunities for development in the current EPC system framework, and proposes options and scenarios for improvement. An action plan with initial steps is provided, along with a monitoring and evaluation framework that Poland can apply to ensure the ongoing effectiveness of EPC schemes.

The last chapter details the main conclusions and recommendations for Poland, and provides a short comparative cross-country analysis of policy gaps and opportunities to establish a replicable framework.

## 1.3 Interactions and inferences between EPCs and other policy instruments

The EPBD introduces significant changes to the framework for EPCs across Member States. A harmonised classification system from Class A to G must be implemented by 29 May 2026 (derogations apply), where Class A corresponds to zero-emission buildings (ZEBs) and Class G identifies the worst-performing buildings in the national stock. Member States that already apply an A0 class for ZEBs may continue this designation, with adjustments to the rest of the scale. The distribution of Classes B to F should ensure a suitable reflection of the national building stock while respecting the EU-wide framework, allowing differentiation by building types (residential/non-residential) and climatic zones. An additional A+ class can be included voluntarily, and is applicable to buildings that have an energy demand 20% lower than the ZEB threshold and that generate more renewable energy on site than they use.

Member States that have rescaled their EPC schemes between 1 January 2019 and 28 May 2024 may defer the new classification requirements until 31 December 2029 to preserve stability in national systems. EPCs must express energy performance as a primary energy indicator kWh/($m^2$.y) and include other indicators such as operational greenhouse gas emissions and on-site renewable energy use. While certain indicators are mandatory, Member States may add voluntary ones such as detailed splits by type of use and building element details, carbon removals, number and type of recharging points for electric vehicles, or smart readiness. EPCs must also have a uniform visual identity nationally, be machine-readable and accessible, and include clear recommendations on energy performance improvement, emissions reductions, and indoor environmental quality.

Affordability is addressed by encouraging Member States to implement measures such as cost caps or financial support for vulnerable households. Quality control provisions require that at least 90% of EPCs are statistically valid and that a minimum of 25% undergo third-party verification when controls are delegated to non-governmental bodies, with the possibility of reducing this share as system reliability improves. Simplified EPC update procedures must be in place when minor improvements or renovation passport measures are implemented.

EPCs remain valid for 10 years, but new certificates must be issued at key trigger points, including construction, major renovation, sale, rental or contract renewal. Display obligations are expanded to cover all public buildings and non-residential buildings frequently visited by the public, regardless of size. These measures aim to improve EPC transparency, comparability and reliability across the EU while allowing flexibility for national adaptation.

In addition to the legal and technical requirements established in the EPBD and its respective guidance documents[1], the development of EPC systems across Member States can be further guided by the strategic insights provided by the NextGen EPC Cluster, which consolidates outputs from nine Horizon 2020 projects focused on next-generation EPCs[2].

This cluster recommends positioning EPCs as a central, user-friendly and interoperable tool in the building decarbonisation agenda, in line with broader EPBD provisions such as minimum energy performance standards (MEPS), ZEBs, renovation passports and digital building logbooks. Key recommendations include:

- Harmonised calculation methodologies: Adoption of a shared core ('kernel') calculation logic based on EU standards (e.g. CEN standards under Mandate M/480), promoting comparability and transparency across Member States.
- Additional focus on non-renewable primary energy, to allow fair comparison across different energy systems and technologies.
- Integration of measured data (e.g. from smart meters or indoor environmental quality sensors) to complement or validate calculated performance, helping to reduce the performance gap and better reflect actual building behaviour.
- Dynamic and user-centric EPCs: Certificates should evolve from being static compliance documents into interactive tools that reflect renovation progress, are updated with real-time data, and are integrated with renovation passports, digital building logbooks and the smart readiness indicator.
- Enhanced quality assurance and training: Establishment of harmonised protocols for third-party verification, continuous training and certification of EPC assessors, and rigorous validation of input data.
- Actionable and forward-looking recommendations: EPCs should provide structured renovation guidance aligned with deep renovation principles and long-term decarbonisation pathways (e.g. target Class A or ZEB by 2050).
- Broader indicator coverage: Certificates should progressively integrate indicators related to indoor environmental quality, smart readiness, carbon performance and climate resilience.
- Full digital interoperability: EPCs must be machine-readable and interoperable with national and EU-level building databases, enabling streamlined integration with public policy tools and financing schemes.

These recommendations support the EPBD's objective of making EPCs a central pillar in planning, implementing and monitoring energy renovation strategies at building, district and national levels, while also enhancing reliability, usability and public trust in the certification process.

**EPCs have an intrinsically pivotal role** in several elements of the EPBD, most notably the ones that are directly addressed by EPBD.wise: EPCs can be used to **check compliance with MEPS**, and they work hand in hand with building **renovation passports – they can be issued jointly and renovation passport improvement measures can replace EPC recommendations in certain cases**. The ZEB definition is intrinsically connected with the EPC, since **EPC labels are built on evenly distributed scales that will always mean a ZEB is Class A**.

When defining **national building renovation plans (NBRPs), one crucial aspect is the definition of the very worst-performing buildings**. These must **correspond to EPC Class G**, which gives the EPC a central role in defining national trajectories for residential building stock, as well as its role in defining minimum energy performance standards (MEPS) for the non-residential sector, which can use thresholds directly linked to EPC classes. In parallel, EPC registers and databases provide a unique, harmonised source of information on the building stock, enabling Member States to map the distribution of energy classes across dwelling types and regions, identify renovation needs, and quantify the shares of worst-performing buildings and energy-poor households. This data infrastructure allows NBRPs to set evidence-based trajectories, monitor progress over time against intermediate milestones (e.g. reductions in the share of Class G and F buildings), and update policy measures as new certificates are issued, thus turning the EPC into a continuous feedback and monitoring tool rather than a one-off compliance document. It is also instrumental in ensuring that the most vulnerable consumers are correctly addressed, as most of them are likely to be living in the worst-performing buildings. EPC-based data can support the targeting and tracking of social measures and dedicated support schemes in line with the EPBD requirements to prioritise the worst-performing and energy-poor households.

**EPCs are also critical as part of the monitoring, reporting and verification of EPBD related initiatives** as they are the core **part of the data to feed the energy performance of buildings database**. These databases are essential for actions across a variety of different levels, as depicted in the EPBD:

1. At the building level, since the data stored will allow easy and free-of-charge access to the full EPC (which includes the identification of energy performance improvement recommendations) for building owners, tenants and managers.
2. At the neighbourhood level, for example as a support tool for initiatives related to energy communities and citizen-led initiatives.
3. At the city/regional level, by providing local authorities with access to data on the energy performance of buildings in their territory (for instance, to facilitate the drafting of heating and cooling plans).
4. At the national level, as this information should be anonymised, made publicly available, coherent and interoperable with other national building databases. It should also be used to better plan, monitor and implement public policies and financing mechanisms.

Furthermore, **EPCs have a role in ensuring adequate funding is in place and aligned with the long-term targets**, and that barriers related to high upfront costs – especially on vulnerable consumers prone to energy poverty – are addressed and prioritised. This can be done at the building level by incorporating renovation passport features and information aligned with the 2050 decarbonisation target and the needs and expectations of building owners, managers and users. EPCs are also a useful tool for providing support to financing schemes pinpointing concrete renovation measures at the building level, as well as for informing, driving and monitoring building renovation policies and funding schemes.

Finally, **EPCs take the lead role in the communication of building energy performance**. EPCs are the key source of information on all aspects related to this metric. They can – and should – include additional indicators and data on subjects such as greenhouse-gas emissions and global warming potential, capacity to provide demand response to the grid, carbon storage and removal, building smartness, and indoor environmental quality.

The following table summarises the interactions between EPCs and other EPBD elements, and the policy directions these imply:

| Policy Instrument / Element | Functional Level | Primary Function | Interaction with EPCs | Policy Inference |
|---|---|---|---|---|
| **Minimum Energy Performance Standards (MEPS)** | Regulatory Enforcement | Define and enforce minimum energy performance thresholds for buildings | EPCs can be used to check compliance with MEPS; energy classes (A-G) can be directly linked to MEPS thresholds | EPCs operationalise MEPS by providing measurable, comparable performance data for enforcement |
| **Renovation Passports (RP)** | Building-Level Execution and target alignment | Provide stepwise renovation roadmaps for individual buildings | EPCs can be issued jointly with RPs; RP improvement measures may replace EPC recommendations in some cases | EPCs and RPs together guide and track deep renovation, aligning building upgrades with policy targets |
| **Zero-Emission Buildings (ZEB)** | Strategic Benchmark | Set the highest energy performance standard (Class A) | EPC energy classes are anchored to ZEB definitions (Class A corresponds to ZEB); EPCs signal ZEB achievement | EPCs communicate ZEB status and progress, supporting national and EU decarbonisation goals |
| **National Building Renovation Plans (NBRP)** | National Strategy | Define national trajectories and targets for building stock | EPCs identify worst-performing buildings (Class G) and track progress towards NBRP targets | EPCs provide data for planning, monitoring and reporting under NBRPs |
| **Digital Building Logbooks (DBL)** | Data Integration | Aggregate building data for policy and financing | EPCs are integrated into DBLs, providing standardised, machine-readable performance data | EPCs enable interoperability and data-driven policy/ funding decisions |
| **Quality Assurance & Control** | System Reliability | Ensure reliability and validity of EPCs | EPCs are subject to independent control systems, third-party verification, and statistical sampling | EPCs' credibility and policy impact depend on robust quality control |
| **Financial Support & Affordability** | Social Equity | Support vulnerable households and promote uptake | EPCs may trigger financial support; affordability measures are linked to EPC issuance and recommendations | EPCs help target and monitor financial support, ensuring equitable policy implementation |
| **Public Information & Awareness** | Communication | Raise awareness and promote energy efficiency | EPCs serve as the main communication tool for building energy performance, including greenhouse gases, global warming potential, and renovation options | EPCs drive public engagement and informed decision-making |

*Table 1 - Interactions between EPC and other EPBD policy elements*

This document explores the opportunities that are open to Poland for effectively addressing the policy needs it has identified, complying with the new EPBD requirements and ensuring the EPC system can contribute to the strategic setting defined above.

2

# METHODOLOGY

This section describes the methodology used to define the policy guidelines for the effective use of EPC schemes in the focus countries. This includes previous work on the specific policy needs, gaps and good practices identified for the countries in question, and the opportunities that the new EPBD may offer.

## 2.1 Approach for developing EPC policy guidelines

The development of EPC policy guidelines started with the mapping of policy needs and best practices, which involved gathering insights from various sources. Initially, insights were drawn from previous EU projects, national initiatives, direct stakeholder engagement, and a thorough review of relevant literature. This comprised a combination of desk research, stakeholder interviews and workshops. Stakeholder interviews at the national level were planned to identify the specific challenges faced in each country. Additionally, collaborative workshops held during policy forums developed by the EPBD.wise project helped to facilitate dialogue among experts, policymakers and stakeholders, fostering the exchange of ideas and the identification of key challenges and policy requirements. While the primary focus of the project is on the six designated countries – i.e. Poland, Greece, Hungary, Poland, Romania and Ukraine – it was nevertheless also crucial to consider its broader implications across the EU.

Therefore, the compilation and analysis of policy needs extend beyond these focus countries, ensuring a comprehensive understanding with potential applicability across EU Member States. To survey and identify policy needs, a questionnaire was distributed to the six countries selected in the EPBD.wise project, allowing respondents to select the most important topics for further development. The results of both questionnaires have been used to identify policy needs in each focus country.

A second stage involved the identification of best practices to help meet the key policy needs identified, with examples retrieved from various EU countries. These examples generally address several challenges, including poor governance due to insufficient collaboration among different levels of government, staff shortages in public administrations, and data-related issues such as availability and quality. In the construction industry, labour and skill shortages, along with fragmented supply chains, hinder workforce capacity and investment.

The previous two steps are further detailed, including all the results and conclusions for each focus country in [2]. This is the first report from the EPBD.wise project, titled “Energy Performance Certificates: Policy needs and best practices”.

Following the initial mapping, the selection was further streamlined by determining which of the countries selected EPCs as a priority for development. On this basis Bulgaria, Greece, Hungary and Poland were chosen as the target countries for advancing with detailed policy guidelines. The overall process for selecting and analysing focus countries, contact points, inputs and further research is depicted in Figure 1 (see Section 2.2 Data collection and analysis).

## 2.2 Data collection and analysis

As has already been stated, one of the main sources for these policy guidelines was the first EPBD.wise deliverable related to EPCs, namely "Energy Performance Certificates: Policy needs and best practices"[2]. Figure 1 below illustrates the overall process, which began with data analysis performed under this framework including desk research, the questionnaire answered by each focus country, and interactions with focus countries in meetings and policy forums.

The next step included a fine-tuning of the best practices in light of specific EPBD opportunities for the country analysed and its planned implementation pathways, and the creation of tailored country questionnaires based on the policy needs identified in the previous step and on additional interactions with focus countries.

In the final step, the policy options, priorities and action plan were peer-reviewed by EPBD.wise partners, contact points in the focus countries, and other stakeholders. The final version of the policy guidelines includes their feedback.

Based on the results of the first two stages of the project, especially on the specific policy needs for the four focus countries, additional questionnaires were developed that included the following subjects:

**1. EPC rescaling and calculation methodology**

**2. EPC databases**

**3. Training and education of experts**

**4. Quality control mechanisms**

**5. Integration of other indicators/schemes with EPCs**

**6. EPC recommendations**

**7. Communication and perception**

The questionnaires provided the basis for the interviews and informed additional data-gathering when required. The main objective was to delve deeper into each policy need, assess the current status of the EPC system in relation to it, scrutinise current planning and activities related to the EPBD transposition, identify the main stakeholders, and pinpoint what kind of short-term actions could be leveraged and proposed.

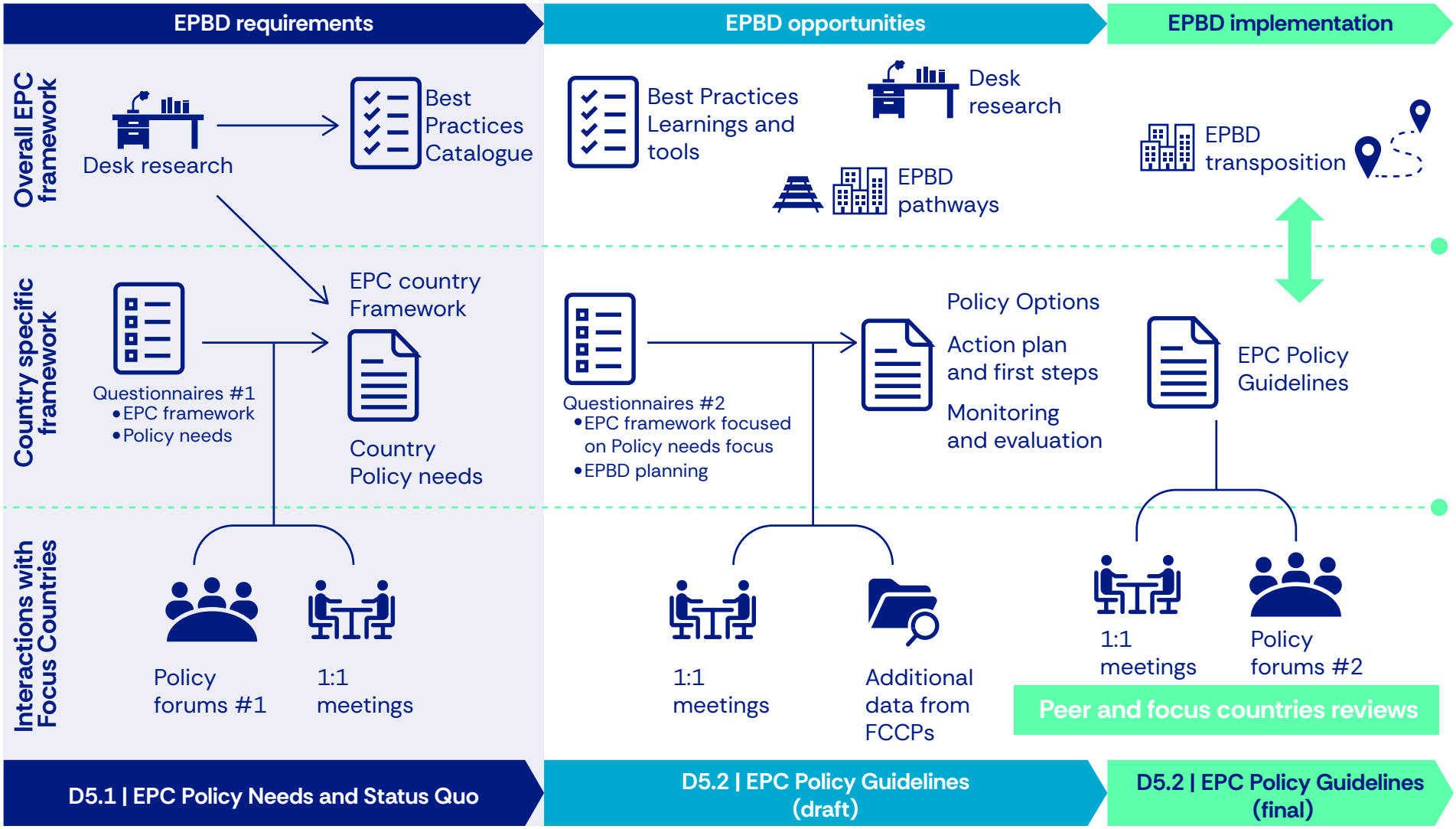


*Figure 1 – Data collection and analysis for EPC policy guidelines development*

3

# POLICY NEEDS AND CURRENT STATUS OF EPCs IN POLAND

In this chapter, a summary of the main policy needs identified in the previous work under EPBD.wise is presented, together with a first prioritisation. For further details, please refer to the EPBD.wise report on "Energy Performance Certificates: Policy needs and best practices"[3].

## 3.1 Policy needs and priorities

EPCs became mandatory in Poland in 2015 for buildings or flats being sold or rented[4], with provisions reinforced in 2023 especially for rentals[5]. Public buildings over 250 m² and customer service buildings over 500 m² must display EPCs if available. Certain building types are exempt from these requirements, including protected monuments, places of worship, and specific industrial and seasonal structures.

Poland currently employs two calculation methods for EPCs: computational and actual use-based approaches. The certificates are stored in a national database managed by the Ministry of Development and Technology, though the system experienced technical difficulties during its initial rollout. The current EPC design uses a graphical 'slider' format to display energy performance ratings.

Several developments are currently under consultation, including a revised version of the EPC that would introduce an energy class system and incorporate $CO_2$ emissions factors. Authorities are also considering replacing the slider format with either an 'etiquette' or 'pyramid' layout.

Despite these regulatory frameworks, implementation challenges persist. Quality assurance mechanisms remain limited, and EPCs are frequently perceived as administrative obligations rather than as practical tools for decision-making. To address these shortcomings, policy priorities should focus on improving communications strategies, strengthening quality control measures, and providing clearer, more actionable recommendations for improving energy performance.

Based on the initial policy needs and priority definitions, and following the meetings and additional data received from the focus countries, the following top five priorities were identified for Poland:

| Poland's policy priorities and measures | | | | | |
|---|---|---|---|---|---|
| **Priority** | **#1** | **#2** | **#3** | **#4** | **#5** |
| **Poland's policy priorities** | Improve communication and public perception | Enhance quality control measures for EPC issuance | Give recommendations for energy performance improvement | Enable clear communication and perception of energy consumption | Create a new EPC layout and rescale |
| **Policy need category** | EPC communication/ perception | EPC quality control | EPC recommendations | EPC communication/ perception | EPC rescaling |
| **Intervention type** | Information and perception | Technical/ legislative and regulatory | Technical | Technical | Technical/ legislative and regulatory |

*Table 2 – Policy priorities and measures for Poland*

Although all aspects of the main policy needs are addressed in each country, this prioritisation exercise was crucial for developing the policy improvement scenarios detailed in Chapter 4. It helped to define and focus on the first steps of the action plan, and to identify relevant stakeholders for prioritised actions.

## 3.2 Current EPC system: opportunities for development

Policy priorities are measures or actions identified for each policy need. In this section, the aim is to explore how the opportunities identified in the EPBD can help to address policy priorities and needs.

It is important to note that Poland held a public consultation process in 2024 on the Minister of Development and Technology's draft regulation on the methodology for determining the energy performance of a building or part of a building, and on EPCs[4]. Stakeholder engagement, including input from national experts, policymakers and the wider public, has played a crucial role in refining these proposals and ensuring their relevance and feasibility.

Certain provisions of the EPBD may present opportunities to fill remaining policy gaps, following Poland's consultation in 2024.

**Policy priority # 1 – Improve communication and public perception:** To address the lack of communication and improve the public perception of EPCs, programmes to provide information, training and awareness-raising should be developed by local and regional authorities, as all Member States are obliged to do. Setting up mandatory one-stop-shops with the criteria defined under Articles 18 and 19(3) of the EPBD[5] and in accordance with the guidance in Commission Notice C/2025/6438[1] is a reliable opportunity for improving public perception.

**Policy priority # 2 – Enhance quality control measures for EPC issuance:** The new EPBD framework requires Member States to implement an independent control system ensuring that at least 90% of issued EPCs are valid with 95% statistical confidence. Furthermore, third-party evaluation is mandated for at least 25% of the random sample when the control system is delegated to non-governmental bodies. To ensure the reliability and effectiveness of the control system, the sampling rate should start at a sufficiently high level and can then be gradually reduced as compliance levels and overall system reliability improve.

**Policy priority # 3 – Make recommendations to improve energy performance:** Under the EPBD, EPCs are expected to include recommendations on energy savings and the potential to reduce operational greenhouse gas emissions, the improvement of indoor environmental quality, financial incentives and benefits, available administrative and technical support, and possible alternatives for the replacement of the heating and cooling system.

**Policy priority # 4 – Ensure clear communication and perception of energy consumption:** EPCs must show primary and final energy use, on-site renewables, operational greenhouse gas emissions, and, where applicable, lifecycle global warming potential in a harmonised A to G format, so that buyers and tenants receive correct, practical information on energy consumption and potential savings.

**Policy priority # 5 – Create a new EPC layout and rescale:** The EPBD requires that EPCs should be rescaled on an A to G scale, with A for ZEBs and G for the worst-performing buildings, ensuring balanced distribution from B to F and an optional A+ sub-level (the new templates must apply by May 2026, extendable to 2029 for post-2019 rescales).They must include primary energy kWh/($m^2$.y), greenhouse gas emissions, and life-cycle global warming potential for A-rated renovations. Annex V of the EPBD sets out the mandatory template for EPCs. It specifies the required indicators on the front page and within the EPC, including at a minimum the A to G class, primary and final energy kWh/($m^2$.y), on-site renewables percentage, operational greenhouse gas emissions, and life-cycle global warming potential where available, plus optional indicators such as energy needs, system details (main energy carrier, main type of element, energy use, peak load and size per use), greenhouse gas emissions class, average U-values, and a Renovation Passport reference.

Table 3 summarises Poland's specific policy needs (as identified in "Energy Performance Certificates: Policy needs and best practices"[3]), the country's current planning, and the opportunities identified in the EPBD.

| Policy needs for effective EPC systems design | Current planning | EPBD opportunities |
|---|---|---|
| **Lack of communication and poor public perception of EPCs** | In line with EPBD transposition (TBD) | Local and regional authorities should be consulted and involved in the development of programmes to provide information, training and awareness-raising.<br>Member States must prepare and carry out information and awareness-raising campaigns. |
| **Insufficient quality control of EPCs, and an inefficient system for issuing them (list of authorised entities, their professional responsibility for EPC quality)** | Public consultation (the new regulation is expected to enter into force in mid-2026) | There are provisions linked to EPC quality control, notably on the validity and (public) availability of EPCs. |
| **EPC recommendations** | Public consultation (the new regulation is expected to enter into force in mid-2026) | Recommendations must include more details on:<br>• The energy savings and operational GHG emissions reduction potential<br>• The improvement of indoor environmental quality<br>• Financial incentives and benefits<br>• Available administrative and technical support<br>• Possible alternatives for the replacement of the heating and cooling system. |
| **EPC rescaling** | Public consultation (the new regulation is expected to enter into force in mid-2026) | Introduce an A to G scale, with A for ZEBs and G for the worst-performing buildings, including primary energy kWh/($m^2$.y), GHG emissions, and life-cycle global warming potential for A-rated renovations. |

*Table 3 – Poland's policy gaps and EPBD opportunities*

4

# EPC POLICY GUIDELINES FOR POLAND

Key policy options and measures for Poland include improving communication and public perception **(Policy priority # 1)**, enhancing quality control measures for EPC issuance **(Policy priority # 2)**, recommendations for energy performance improvement **(Policy priority # 3)**, clear communication and perception of energy consumption **(Policy priority # 4)**, and a new EPC layout and rescaling **(Policy priority # 5)**.

## 4.1 Policy options and scenario for improvement

With the public consultation[4], it was possible to identify strategies and actions to address some of Poland's policy gaps. Stakeholders suggested changes to the proposed legislation, which indicate there are significant opportunities for improving the new EPC system. By incorporating the results of the consultation, the following measures aim to transform EPCs into a more effective tool for raising public awareness, decision-making and policy implementation. The focus is on achievable measures – such as updating the layout of EPCs, improving quality assurance and recommendations for improving systems – to support continued adaptation to the new requirements of the EPBD and ensure that EPCs become a central pillar of Poland's energy transition and building renovation strategies.

Fala Renowacji's submission to the public consultation process addressed several critical aspects of the proposed EPC template. First, it suggested substantial improvements in information presentation, calling for enhanced readability, clearer formatting, and a more user-friendly layout that would make the document genuinely accessible to end users. Its second suggestion was to include key technical recommendations on how to improve systems and building elements and incorporate a 'total annual primary energy consumption' indicator to provide recipients with more comprehensive performance data. Fala Renowacji also proposed methodological refinements, including the adoption of EN 15978 standard-compliant calculations for assessing buildings' carbon footprints. It also questioned the established limit values for energy performance class indices and suggested reconsidering the current 'speedometer' visualisation format, among other technical and presentational improvements.

### Policy priority # 1 – Improve communication and public perception

For effective public awareness and understanding of EPCs, Poland's pathway requires a combination of measures, including action strategies adapted to key target groups, information campaigns on TV, social product-placement in TV series, EPC classes being visible in all advertisements for the sale of houses or flats, and a simpler poster-style version of the EPC being shown in public spaces in public buildings. It is also important to establish one-stop-shops that offer integrated advisory, administrative and financial services that will help building owners navigate renovation processes, linking EPC outcomes with practical support, real benefits and incentives. To enhance communication and perception of energy consumption, consider the use of final energy for streamlined communication, while keeping primary and final energy indicators for calculation and EPC front page.

### Policy priority # 2 – Enhance quality control measures for EPC issuance

Given the current situation in Poland – EPC inspections are limited in number and are only performed after buyer requests – improving quality control is essential. The recommended approach is to broaden the system to include independent verification, automated checks, strict standards for assessors, well-defined penalties for non-compliance, and (possibly) third-party oversight. Such measures would enable more frequent and consistent checks, ensure impartiality, and enhance the credibility and reliability of the EPC system as it grows.

### Policy priority # 3 – Make recommendations to improve energy performance

During the public consultation, a revised format for energy performance recommendations was proposed to improve clarity and usability for building owners and tenants. While this included clear recommendations and visual information on energy class and emissions, it would also be useful to include a short summary describing how estimates and suggestions are derived. Furthermore, adding a mini-audit or concise documentation within the certification phase would help users to understand the basis for energy savings and modernisation advice, support transparency, and foster greater trust in the certificate as a practical renovation tool.

### Policy priority # 4 – Ensure clear communication and perception of energy consumption

During meetings with Fala Renowacji, a need was identified to change the way energy consumption is presented. Fala Renowacji proposed using final energy for communication and primary energy for calculation.

### Policy priority # 5 – Create a new EPC layout and rescale

A new EPC layout is also recommended, especially rescaling. Currently, Poland uses a continuous scale without energy classes. In the public consultation, a new version was proposed resembling the 'etiquette' or 'pyramid' layout used for electric products. A more easily understandable version of the EPC for display purposes was also proposed.

These measures are not only technically feasible but also strategically important for Poland's broader energy policy objectives. The following section outlines how each priority measure relates to other policy elements, and how it supports EPBD compliance and contributes to national decarbonisation goals.

**Links with other policy elements**

Ensuring clear communication and perception of energy consumption directly supports the role of EPCs as a communication tool for building energy performance. As highlighted in Chapter 1.3, EPCs serve as the primary mechanism for conveying information on energy performance. This measure also aligns with the requirement for EPC data to be made publicly accessible at different levels, from individual buildings to national databases, ensuring transparency and informed decision-making.

The enhancement of quality control measures for EPC issuance is critical for ensuring that EPCs reliably serve as a verification mechanism for compliance with MEPS. Since MEPS rely on EPC data to define and enforce minimum energy efficiency levels, inaccuracies in EPCs could undermine their effectiveness. Robust and reliable EPCs are also pivotal for the accurate identification of the worst-performing buildings; without trustworthy EPC information, it becomes difficult to consistently classify these buildings and determine whether they meet, or fall below, the required performance thresholds. Additionally, improved quality control supports monitoring, reporting and verification functions, which are essential for tracking progress toward NBRPs and overall energy efficiency goals.

Efforts to improve communication and public perception of EPCs are closely linked to the role of EPCs in supporting building renovation passports, enhancing their effectiveness in guiding renovation processes. Furthermore, raising awareness about EPCs aligns with their function in supporting financing schemes, as it makes the benefits of renovation more tangible for building owners and helps address challenges related to high upfront costs, particularly for vulnerable consumers.

Strengthening EPC recommendations further reinforces their role in defining NBRPs. Identifying and addressing the worst-performing buildings – those classified under Class G – is a fundamental step in defining renovation priorities. Ensuring that EPC recommendations are accurate and actionable supports the development of effective policies for energy-efficient renovations. This measure also enhances the role of EPCs in guiding funding mechanisms, ensuring that investments in building renovations are based on reliable data and targeted at the most critical areas.

A new EPC layout will also contribute to making EPCs more understandable and accessible. A clearer, more user-friendly design will improve public perception and awareness by ensuring that key information – such as energy performance ratings, renovation recommendations and additional indicators (e.g. greenhouse gas emissions, smart building features) – is presented in a way that is easy to interpret.

| Measure | EPBD requirements | Country-specific pathway | Responsible for policy implementation |
|---|---|---|---|
| **Policy priority # 1**<br>Improve communication and public perception | Local and regional authorities should be consulted and involved in the development of programmes to provide information, training and awareness-raising.<br><br>Member States must prepare and carry out information and awareness-raising campaigns. | Action strategies including targeted campaigns (TV, product placement, ads with EPC classes), and simpler poster-style EPCs in public spaces.<br><br>Establish one-stop-shops. | Ministry of Development and Technology, Regional and local administrations |
| **Policy priority # 2**<br>Enhance quality control measures for EPC issuance | There must be provisions linked to EPC quality control, notably on their validity and (public) availability. | Ensure independent verification, automated checks, strict assessor standards, penalties, and possible third-party oversight. | Ministry of Development and Technology |
| **Policy priority # 3**<br>Make recommendations to improve energy performance | Recommendations must now also include more details on:<br>• The energy savings and operational greenhouse gas emissions reduction potential<br>• The improvement of indoor environmental quality<br>• Financial incentives and benefits<br>• Available administrative and technical support<br>• Possible alternatives for the replacement of the heating and cooling system. | It is necessary to add some additional information to the proposed recommendations in public consultation, such as where the results come from – this indicates a 'mini-audit' at the certificate stage. | Ministry of Development and Technology |
| **Policy priority # 4**<br>Ensure clear communication and perception of energy consumption | The EPC should provide information on its primary and final energy consumption. | Use final energy for communication and primary energy for calculation. | Ministry of Development and Technology |
| **Policy priority # 5**<br>Create a new EPC layout and rescale | Create an EPC template (see Annex 5). | Use a new EPC template with the 'etiquette' or 'pyramid' layout used for electric products. Create a more easily understandable version of the EPC for display purposes. | Ministry of Development and Technology |

*Table 4 – Poland: specific measures to be implemented, suggested country pathways, and responsible entities*

## 4.2 Details on implementation of high-priority measures

This chapter presents a selection of priority measures which have the strongest potential to address key challenges. Each measure is described and analysed in detail, with particular attention to its implementation pathway, expected benefits, and role within the broader policy framework. The aim is to provide practical and actionable insights into how these measures can be translated into effective action.

### 4.2.1 What is foreseen in the EPBD?

On the communication side, the EPBD emphasises improving public awareness and perception of energy consumption via EPCs. Certificates must be designed to clearly present key information such as the energy performance class, numerical energy use indicators, renewable energy contribution and greenhouse gas emissions, in a user-friendly and accessible format. EPCs must be displayed prominently in public and frequently visited non-residential buildings, and the energy rating is to be included in all property advertisements, ensuring that energy performance information reaches a wide audience. Complementing these requirements, the directive encourages the establishment of one-stop-shops, which provide integrated technical, financial and advisory services to building owners and occupants. These one-stop-shops play a crucial role in increasing understanding and uptake of energy efficiency measures by offering tailored support and facilitating access to information and incentives.

The EPBD sets clear requirements to enhance quality control in the issuance of EPCs. Member States must establish independent control systems that ensure EPCs are accurate and reliable. These systems involve defining a clear concept of a valid EPC, performing random checks on issued certificates, and conducting site visits or virtual inspections for a representative sample. The control process includes validating input data, verifying the methodology used, and assessing the completeness and correctness of the certificates. Additionally, penalties and sanctions can be applied to professionals who do not comply with quality standards. The experts who issue EPCs must be independent and qualified. Transparency is promoted through publishing statistical quality reports and maintaining accessible databases.

Together, these measures aim to build trust and engagement with EPCs, strengthening their role as effective tools for enhancing energy literacy and motivating building renovations.

| Requirement | Summary |
|---|---|
| **Quality control and independent verification** | Poland must establish independent control systems for EPCs including random checks, site or virtual inspections, validation of input data, methodology verification, and penalties for non-compliance. EPC experts must be independent and qualified, and statistical quality reports must be published to ensure transparency. |
| **Transparent EPC design** | EPCs must clearly present the energy class, numerical energy use, renewables contribution and greenhouse gas emissions in an accessible format. Certificates should be displayed prominently in public buildings and included in real estate advertising, ensuring wide public access to information. |
| **Public awareness** | The EPBD requires proactive public awareness campaigns to clarify EPC benefits, promote understanding of energy efficiency, and ensure EPC visibility – such as having them on display in frequently visited non-residential buildings, and ensuring they are clearly communicated in property listings. |
| **One-stop-shops** | One-stop-shops must be established as integrated support points offering technical, financial and advisory services for building owners and occupants, streamlining access to information, incentives and expert guidance for adopting energy efficiency measures. |

*Table 5 – EPBD requirements related to Poland's measures*

### 4.2.2 What has the country already done in relation to the measure(s)?

Poland has made some initial steps toward improving communication and public perception (**Policy priority # 1**) and enhancing quality control measures for EPC issuance (**Policy priority # 2**).

In terms of communication and public perception, Poland recognises significant challenges: EPCs are often seen as administrative burdens rather than as valuable tools for energy performance. Initial media coverage during the EPC rollouts in 2019 and 2022 was mixed or negative, prompting the Ministry to issue clarifications and gradually increase its communications efforts.

Regarding quality control, Poland established a central EPC database managed by the Ministry of Development and Technology in 2023, though it encountered initial technical issues. However, quality control practices remain limited, lacking a comprehensive, fully operational independent verification system. EPCs are issued by a diverse group of professionals with varying qualifications, and there is not yet a strict standardised quality assurance framework. The Ministry conducts inspections upon request, primarily initiated by buyers, but these checks are only performed on a small scale. Efforts are underway to develop a more robust quality framework, including third-party verification and statistical validation procedures aligned with the requirements of the recast EPBD. Training and certification schemes exist but lack uniform standards to ensure consistent assessor competence. Outsourcing quality control to external bodies is being discussed, balancing reliability benefits against additional costs and administrative complexity.

On the communication front, the consultation considered improvements to the EPC layout to increase its user-friendliness, including clearer presentation of energy classes and emissions data. Participants debated the appropriate thresholds for energy class categories to reflect the true distribution of building performance in Poland. Strategies to enhance public perception and awareness were also discussed, emphasising targeted campaigns for demographic groups such as elderly homeowners and their heirs. The proposal included increasing EPC visibility in property advertisements and public buildings, as well as developing simplified formats.

Regarding quality control, discussions addressed the need for a clear definition of valid EPCs and the establishment of robust independent verification mechanisms. Stakeholders highlighted the importance of standardised methodologies for verifying the accuracy of assessments, including auditing procedures and penalties for non-compliance. The consultation explored proposals for introducing third-party verification and statistical validation to strengthen the reliability of issued EPCs.

Additionally, the consultation addressed the potential role of one-stop-shops in providing integrated services to building owners, supporting information dissemination and facilitating energy renovations.

| EPBD obligation or measure | Implemented in Poland? | Notes | Deadline |
|---|---|---|---|
| Quality control of EPC issuance | Yes, but needs improvement | Independent verification system is not fully implemented; limited quality assurance; inspections are mostly on request; uniform standards for assessors are still lacking. | 29 May 2026 |
| Communication and public perception | No | EPCs are often seen as administrative burdens, and received mixed early media coverage; key groups need targeted campaigns; simplified formats are in progress. | Continuous |
| One-stop-shops and advisory support | No (early stage) | Discussed during public consultation, but not yet broadly established; further policy work, funding and awareness are required for effective rollout. | 29 May 2026 |

*Table 6 – Implementation status of measures and obligations*

### 4.2.3 What can be done?

To effectively advance the implementation of enhanced quality control and improved communication regarding EPCs in Poland, a comprehensive and phased approach is recommended, drawing on best practices from European peers and aligned with the requirements of the EPBD.

First, improving communication and public awareness requires the design and rollout of sustained, multi-channel educational campaigns tailored to different demographic groups, such as elderly and vulnerable people and potential building heirs. The obligatory display of concise EPC summaries in real estate advertisements and public buildings will improve visibility and acceptance. Furthermore, establishing one-stop-shops that offer integrated advisory, administrative and financial services will help building owners navigate renovation processes, linking EPC outcomes with practical support and incentives.

Second, to strengthen quality control, Poland should establish a robust, independent verification system that includes mandatory random sampling and targeted auditing of EPCs to ensure a minimum certification validity of 90%. Automated validation tools integrated within the national EPC database can increase efficiency by detecting input errors during issuance. Clear protocols for assessor accreditation, ongoing training and recertification must be put in place to standardise qualifications and performance. Regulatory mechanisms should introduce enforceable penalties for non-compliance, and consideration should be given to outsourcing elements of quality control to third-party entities to increase transparency and resource efficiency.

Strategically, these efforts should be supported by adequate funding, inter-agency coordination and active stakeholder engagement, including with training providers, construction professionals and policymakers. Regular monitoring and evaluation systems will be essential to track progress and refine approaches.

The EPC's visual layout should be simplified and modernised to enhance clarity, including the clear presentation of energy class and greenhouse gas emissions data. Below in Table 7 is an analysis of what Poland will need to change on the front page of its EPC, in accordance with Annex V of the EPBD.

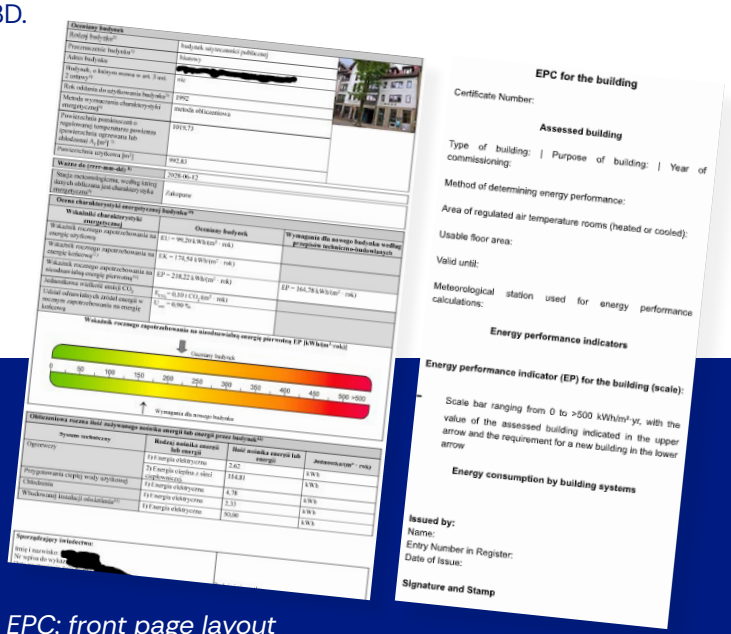


*Figure 2 – Poland's EPC: front page layout*

| EPBD requirements (front page) | Present in EPC? | Present |
|---|---|---|
| Energy performance class | Partial | Numerical values and energy demand bars shown; letters A and G not prominently displayed on front page |
| Calculated annual primary and final energy use in kWh/(m².y) and kWh or MWh | Yes | Values for annual, useful, final and primary energy (including corrected) in kWh/(m².y) clearly indicated |
| Renewable energy produced on site (% and total, main energy carrier) | No | Only total renewable share in final energy demand indicated; breakdown by on-site production and main energy carrier is not provided |
| Operational greenhouse gas emissions in kg$CO_2$/m²/year | Partial | $CO_2$ emissions shown; global warming potential not included |
| Calculated energy needs in kWh/(m².y) | Yes | Energy needs broken down by system and use |
| Capacity to react to external signals (yes/no) | No | Not indicated |
| Heat distribution system capable for low or more efficient temperature levels, where applicable (yes/no) | No | Not indicated |
| Contact information of the relevant one-stop-shop | No | Only certifier's contact details are included; no mention of a one-stop-shop |

*Table 7 – Status of EPBD Annex V requirements for EPC front page layout*

## 4.3 Proposed action plan and first steps

This section comprises two tables that list the stakeholders and their respective roles in EPC improvement (Table 8) along with a proposed action plan (Table 9). The good practices that can add value to the measures are also referenced. Further details on these good practices can be found in the EPBD.wise report "Energy Performance Certificates: Policy needs and best practices"[3].

| Stakeholder name | Category | Role | How to be involved |
|---|---|---|---|
| Ministry of Development and Technology | Government | Implementing and managing new policies | Meetings, workshops, emails, content development, policy validation, data provision, communication |
| Fala Renowacji | Energy experts | Supporting implementation of new policies and providing technical expertise | Content development, policy validation, technical expertise, data provision |
| Universities and other educational institutions | Academia | Organising training for auditors | Training, workshops |
| Finance sector | Business/Government | Financing training; providing financial support | Finance provision, EPC promotion |
| Real estate sector | Business | Adapting the real estate market to the new policies | Integrate EPBD minimum standards |
| Independent energy consultants | Energy experts | Providing technical expertise | Content development, technical expertise, data provision |
| Developers of database and programs for EPC calculations | Developers | Providing technical expertise | Content development, technical expertise, data provision |

*Table 8 – Poland's EPC policy improvement stakeholders and their roles*

| Priority | Objective | Key activities | Good practices | Responsible for policy implementation | Expected outputs | Timeline |
|---|---|---|---|---|---|---|
| **Policy priority # 1**<br><br>Improve communication and public perception | Enhance public understanding and perception of EPCs | • Develop targeted awareness campaigns engaging regional authorities and OSS to streamline renovation and EPC promotion<br>• Coordinate with OSS to link EPCs with renovation advice and financial incentives. | D5.1 – Scotland's HES OSSs (Good Practice No. 5)<br><br>D5.1 – Denmark's Owner-Oriented EPCs (Good Practice No. 6) | Ministry of Development and Technology, Fala Renowacji | Raised public EPC awareness and improved uptake of renovation advisory services | Continuous |
| **Policy priority # 2**<br><br>Enhance quality control measures for EPC issuance | Clear EPC independent verification and auditing to ensure compliance | • Define clear criteria for valid EPCs; establish robust, independent verification.<br>• Standardize auditing procedures and enforce penalties for non-compliance.<br>• Introduce third-party verification and statistical validation of EPCs | D5.1 – Portuguese Quality Assessment System (Good Practice No. 2)<br><br>D5.1 – Ireland's Quality Assurance (Good Practice No. 3) | Ministry of Development and Technology, Fala Renowacji | Improved EPC reliability and trust | 29th May 2026 |
| **Policy priority # 3**<br><br>Make recommendations to improve energy performance | Make EPC renovation advice more actionable | • Enrich EPC with detailed energy saving and emissions reduction recommendations<br>• Link EPC advice with financing | D5.1 – Denmark's Owner-Oriented EPCs (Good Practice No. 6) | Ministry of Development and Technology, Fala Renowacji | More targeted renovations and energy savings | 29 May 2026 |
| **Policy priority # 4**<br><br>Ensure clear communication and perception of energy consumption | Ensure EPC data are understandable to all users | • Consider the use of final energy for streamlined communication, and primary and final energy indicators for calculation and EPC front page | - | Ministry of Development and Technology, Fala Renowacji, ZAE (Association of Energy Auditors) | Better public understanding of energy consumption | 29 May 2026 |
| **Policy priority # 5**<br><br>Create a new EPC layout and rescale | Align EPC layout with EPBD requirements | • Create energy classes<br>• Incorporate feedback from public and experts | D5.1 – Denmark's Owner-Oriented EPCs (Good Practice No. 6) | Ministry of Development and Technology, Fala Renowacji | EPC system aligned with EU standards and comparability | 29 May 2026 |

*Table 9 – Poland's proposed action plan*

**Timeline for implementation of measures under the EPBD**

The deadlines indicated for each priority in Poland's action plan are aligned with the timetable for transposing and implementing the new EPBD, while reflecting Poland's current reform process, including the 2024 public consultation on the draft regulation on energy performance calculation and EPCs. The more structural measures – enhancing quality control measures for EPC issuance (**Policy priority # 2**), making recommendations to improve energy performance (**Policy priority # 3**), ensuring clear communication and perception of energy consumption (**Policy priority # 4**), and adapting the EPC layout and rescaling (**Policy priority # 5**) – should be in force by the deadline of 29 May 2026 set in Directive (EU) 2024/1275 to ensure compliance.

Priorities that depend primarily on communication, awareness and stakeholder engagement – improving communication and public perception of EPCs (**Policy priority # 1**) and, more broadly, building trust and understanding around the new EPC layout and information – are defined as ongoing actions, as they require continuous awarenessraising, iterative feedback from users and a progressive adjustment of messages and tools in step with the evolving regulatory framework and market conditions in Poland.

## 4.4 Monitoring and evaluation of EPC schemes

Effective monitoring, reporting and evaluation are essential to ensure that EPC schemes fulfil their central role within the EPBD. As emphasised in the EPBD.wise report "An Integrated MR&E Framework for Effective EPBD Implementation", EPCs are not merely compliance documents but pivotal datagenerating instruments for tracking progress in renovation, energy performance, zeroemission pathways, and policy coherence across the building sector. Key points for EPC schemes include:

**Monitoring:** Ensuring that EPC data – including energy classes, primary energy indicators, operational greenhouse gas emissions, recommendations and building characteristics – are continuously collected, validated and fed into national databases. These databases must integrate EPCs with inspection data, renovation passports, the smart readiness indicator, and measured building consumption where available.

**Reporting:** Member States must ensure transparent, harmonised annual reporting to the national building performance database and the EU Building Stock Observatory. This allows EPCbased indicators to inform NBRPs, MEPS implementation, ZEB uptake, and financial planning at national and EU levels.

**Evaluation:** Evaluation checks the extent to which EPCs are providing actionable insights. The EPBD.wise monitoring, reporting and evaluation framework recommends that this should include:

- the quality and statistical validity of issued EPCs (quality control);
- the effectiveness of EPC recommendations in triggering renovations; and
- the impact and support provided by EPC schemes on policy objectives such as MEPS and trajectories compliance, energy poverty alleviation, financing schemes and progress toward ZEBs.

Best-practice examples from other focus countries include the following:

**Portuguese quality assessment system:** Ensuring the quality and reliability of EPCs through rigorous verification processes, qualified experts meticulously examine data and information recorded by EPC assessors to ensure accuracy and compliance with established criteria and methodologies. The Directorate General for Energy and Geology (DGEG) promotes confidence among stakeholders (including building owners, real estate agents and policymakers) by ensuring the reliability of the EPC database. The Portuguese energy agency ADENE's approach involves a systematic review of EPCs to verify the correctness of energy performance indicators, the appropriateness of the selected calculation methodologies, and compliance with national and EU regulations. This system's effectiveness is enhanced by close and effective communication with experts, focusing on error prevention rather than penalties, through proactive monitoring and the accompaniment of assessors during building visits. This could be a good approach for Poland to implement, as it requires quality control and a database that reflects the real state of the building stock. However, it does raise issues such as how to guarantee reliability and independence, as well as increased costs.

**Ireland's quality assurance risk-based approach:** This provides guidelines and performance criteria to assessors, ensuring their competency and upholding the credibility of EPCs. Continuous monitoring and stakeholder engagement enhance EPC quality control. The Irish system involves comprehensive checks on EPC data, assessment methodologies, and compliance with national and EU standards. Feedback mechanisms have been established to improve the performance of assessors and maintain the accuracy of the EPC database. As with the previous good practice, Poland could significantly benefit from this approach to improve the quality control of its EPCs and database. However, it remains difficult to implement without an external organisation in charge.

**Portugal's EPC financing:** This serves various stakeholders and objectives by providing tailored recommendations, taxation benefits and financial incentives to promote energy efficiency initiatives. Portugal's EPCs play a pivotal role in incentivising renovation actions, facilitating access to funding schemes and supporting comprehensive energy efficiency improvements. By integrating various policy objectives into the EPC framework Portugal addresses multiple needs, including EPC recommendations, database management, and the integration of other indicators and schemes. This approach could be an option for improving public perception and the EPC database in Poland, as well as providing more detailed funding recommendations as the database is improved.

**United Kingdom EPC quality control:** UK EPCs have quality control guidelines to ensure accuracy and consistency. Energy assessors are required to maintain comprehensive records for each EPC they produce. These records should include data files or software data collection forms that detail the information used in the EPC calculation, allowing quality assurance assessors to verify the accuracy of each data entry stage associated with the Simplified Building Energy Model or Dynamic Simulation Model. Additionally, design documents such as floor plans, elevations and sections should be retained to facilitate EPC recalculations if necessary. Site notes, whether in paper or electronic format, are also essential components of the documentation. For Poland, this good practice could help in providing reliable and standardised data on a building's energy performance. Another key opportunity is to increase consumer and stakeholder confidence by making EPCs a trusted tool for property owners, tenants and investors.

5

# CONCLUSIONS, RECOMMENDATIONS AND NEXT STEPS

A comparative analysis of the policy needs across the focus countries enables a clearer understanding of the context, preparing the ground for replication of good practices and highlighting areas for each country to build upon. The table below is updated from the EPBD.wise report on Energy Performance Certificates: Policy needs and best practices[3], including the results of recent interactions with focus countries and additional data provided.

The table below is updated from the EPBD.wise report on "Energy Performance Certificates: Policy needs and best practices"[2], including the results of recent interactions with focus countries and additional data provided.

| Intervention type | Policy needs | Bulgaria | Greece | Hungary | Poland |
|---|---|---|---|---|---|
| Technical/Legislative and regulatory | EPC rescaling and calculation methodology | Yes | Yes | Yes | Yes |
| Technical/Legislative and regulatory | EPC quality control | Yes | Yes | Yes | Yes |
| Information and perception | EPC communication/perception | No | Yes | Yes | Yes |
| Technical | EPC databases | Yes | No | Yes | No |
| Technical/Information and perception | EPC recommendations | No | No | Yes | Yes |
| Technical/Legislative and regulatory | Integration of other indicators/ schemes with EPC | No | Yes | Yes | Yes |
| Technical | Training and auditor capacitation | Yes | Yes | No | No |

● Policy needs **identified as priority** from the start of the EPBD.wise process
● Policy needs that have **shifted priority** between the *EPC Policy needs and best practices* and the *EPC Policy Guidelines*
○ Policy needs that were not identified as priority

*Table 10 – Policy needs categorised by intervention type, per country*

The main priorities for all countries included are related to the technical, legislative and regulatory, and information and perception aspects of EPCs. More specifically, policy needs in all the countries concern the methodology for rescaling and calculating EPCs, quality control mechanisms, and communication and perception. The summary table above also shows that although most countries did not identify core issues regarding the methodology for rescaling and calculating EPCs as policy needs in the first step, these aspects were subsequently highlighted when the requirements of the EPBD were analysed. This also reflects the importance of these two major changes in the EPBD and the fact that, in most cases, rescaling and new mandatory indicators for calculating EPCs and defining MEPS and national trajectories will require significant methodological changes. This should be seen as a trigger point for other interventions, for instance in setting up improved databases and to boost wider communication strategies. These conclusions and common priorities define a first framework for replicating the policy guidelines in additional countries.

Poland's approach provides useful insights for other countries. One example is its use of extensive public consultation processes to finetune the final approach to the EPC system, together with the fact that EPC layout alternatives have also been opened up for consultation.

To strengthen quality-control procedures for EPC issuance, Poland could implement independent verification, automated compliance checks, strict professional standards for assessors, the application of penalties, and potential third-party oversight. From a technical perspective, a new EPC layout was proposed in the public consultation that mirrors an energy-label style to improve clarity for users. Recommendations for improving systems were also proposed. However, source information is lacking, effectively operating as a 'mini-audit' at the certification stage. In terms of information and public perception, actions should focus on enhancing public awareness and understanding of EPCs through one-stop-shops and targeted campaigns – such as TV spots, product placement, adverts highlighting EPC classes, and simplified poster-style EPCs in public spaces – alongside clearer communication of energy consumption by using final energy for public messaging and primary energy for calculation purposes.

Poland should continue using public consultation as a core tool for policy refinement, ensuring that stakeholder feedback directly informs both the procedural aspects and the visual presentation of EPCs. The iterative use of consultation will help to maintain transparency and build trust in the system.

Next, a targeted effort should be made to enhance the training of auditors and to increase the skills of relevant professionals. This would address the need for consistent quality control and help to raise the overall standard of EPC issuance. Furthermore, Poland could benefit from investing in the development and integration of robust databases, facilitating more accurate tracking of EPC data and supporting improved policy monitoring and evaluation.

In terms of communication, Poland should expand its outreach strategies to ensure that both professionals and the general public are well informed about upcoming changes, especially regarding rescaling and calculation methodologies. These communications strategies should be multi-channel and tailored to different audience segments for maximum impact.

In conclusion, Poland's approach serves as a valuable model for other countries, particularly due to its emphasis on stakeholder engagement and transparency. By continuing to prioritise quality control, capacity building and effective communication, Poland can further enhance the reliability and perception of its EPC system, supporting the successful implementation of the EPBD's objectives and facilitating replication in other contexts.

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