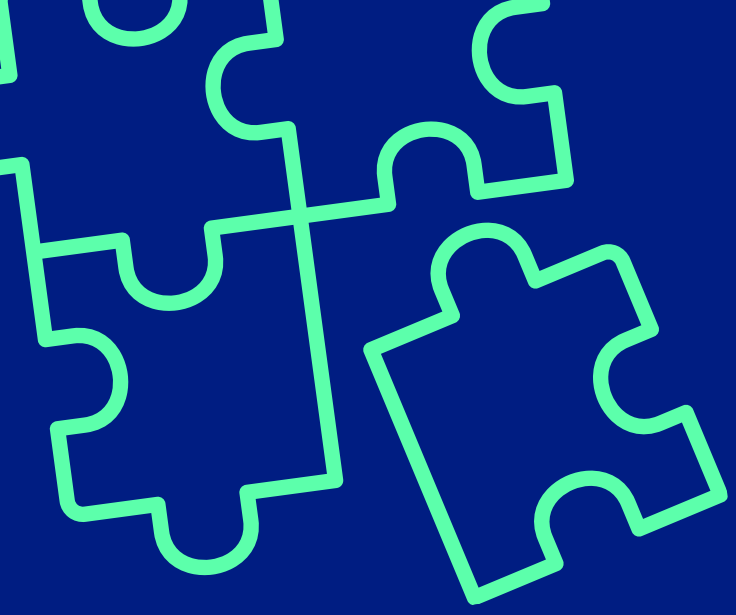




How to solve the EPBD implementation puzzle?

Article 9 MEPS and renovation trajectories: policy guidelines

What we found:

Regulatory standards are necessary. Market instruments alone are insufficient

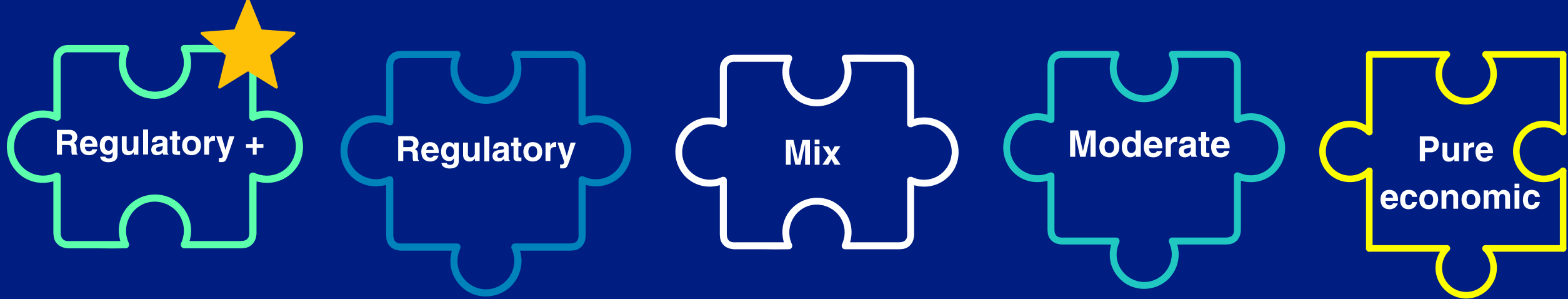
27 Member States covered

5 policy scenarios modelled

Main differentiating factors:

- PEF for electricity
- fossil fuel share

The scenarios



Scenario	CO ₂ price	Subsidies	Ban fossil-based boilers	Residential	Non-residential
★ Regulatory+	€75/t	Moderate	Yes	MEPS	MEPS
Regulatory	€75/t	Moderate	No	MEPS	MEPS
Mix	€300/t	High	No	No MEPS	MEPS
Moderate	€75/t	Moderate	No	No MEPS	MEPS
Pure economic	€300/t	High	No	No MEPS	No MEPS

For non-residential buildings (Art. 9.1)

- ★ Regulatory+ is the top performer.
- 💡 Mix performs comparably in most countries and even outperforms Regulatory+ in some building categories, suggesting economic instruments can work when combined with standards.

For residential buildings (Art. 9.2)

- ✗ Moderate scenario fails both 2030 and 2035 targets in most countries.
- 🕒 Decreasing future primary energy factors helps achieve the targets faster.

Good practice examples

Trigger-point obligations	Linking renovation requirements to property transactions	
Phased bans on worst-performing buildings	Several Member States have introduced time-bound phase-out trajectories for the lowest EPC classes	
Sector-specific standards for non-residential buildings	For example, reductions in final energy consumption by 2030, 2040 or 2050 for commercial buildings of a certain size	
Enforcement mechanisms	Financial penalties	
Financial support and one-stop-shop services	Green bonds, energy loans, interest-free loans, government grants for low-income households, combining tax incentives and green loans with preferential interest rates Free nationwide advisory services and area-based local authority schemes for hard-to-reach properties	

Priority actions for Member States

- Invest in robust building stock data as a prerequisite for threshold-setting
- Combine mandatory standards with financial support
- Protect vulnerable households through targeted financing and adapted governance
- Embed Article 9 trajectories within NBRPs for monitoring and policy coherence



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