

# EPBD Directive France – Deep Dive

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How France is implementing the revised EPBD and what it means for real estate owners, lenders, and asset managers.



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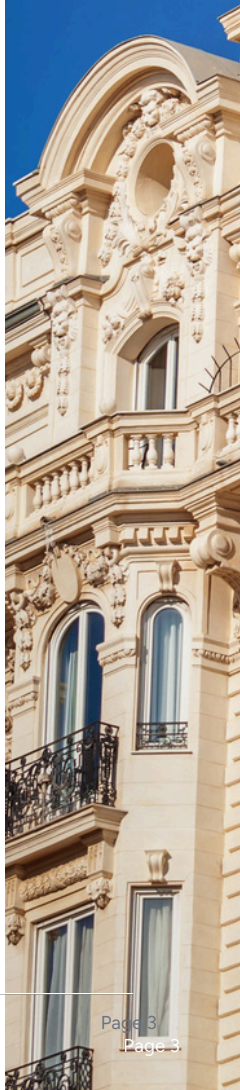
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# 1. Executive Summary

France is among the most advanced Member States in implementing the revised EPBD, with many requirements already embedded in national legislation. Several developments stand out within the French implementation framework.

- **Residential buildings – Progressive rental restrictions for inefficient dwellings and mandatory energy audits for property sales are accelerating renovation activity.**
- **Non-residential buildings – The Décret Tertiaire introduces binding energy reduction targets of 40% by 2030, 50% by 2040 and 60% by 2050 for buildings over 1,000 sqm.**
- **Building automation – Mandatory Building Automation and Control Systems (BACS) are expanding across the non-residential building stock to improve operational energy performance.**
- **Energy Performance Certificates – France has updated its DPE methodology, introducing revised electricity conversion factors while maintaining dual energy and carbon performance indicators.**
- **Solar obligations – Requirements for photovoltaic installations continue to expand across new developments, existing non-residential buildings and parking areas.**
- **Whole life carbon – RE2020 places France among Europe's leading markets for embodied and operational carbon regulation through mandatory lifecycle carbon assessment.**

France is shifting from a compliance-driven approach to a performance-driven real estate market, where energy efficiency, carbon performance and renovation readiness increasingly influence asset value, investment decisions and long-term portfolio resilience.



## 2. Introduction

### France's EPBD Implementation: From Compliance to Performance

France has long been at the forefront of building energy regulation in Europe. Rather than creating an entirely new framework to implement the revised Energy Performance of Buildings Directive (EPBD), the country is building upon an established foundation of legislation, including the Loi Climat et Résilience, RE2020, the Décret Tertiaire, the Décret BACS, and the Loi APER.

The result is one of Europe's most comprehensive approaches to improving building performance, reducing carbon emissions and accelerating the decarbonisation of the built environment.

For investors, owners, lenders and asset managers, these changes extend well beyond regulatory compliance. Energy performance, operational efficiency, lifecycle carbon and renovation readiness are becoming increasingly important factors in asset valuation, financing decisions and long-term portfolio resilience.

This report provides an overview of France's implementation of the revised EPBD and highlights the regulatory developments that will shape the country's real estate market in the years ahead.



# 5. Building Automation and Control Systems (BACS)

## Automatic Adjustment of Energy Consumption

France has implemented Building Automation and Control System (BACS) requirements through the Décret BACS.

The regulation requires the installation of Building Management Systems (BMS) in non-residential buildings according to HVAC capacity.

### Implementation is phased:

- From 1 January 2025: Buildings with HVAC systems exceeding 290 kW must install a Building Management System.
- From 2030: Buildings with HVAC systems exceeding 70 kW must also comply.

Building Management Systems enable automated monitoring and control of heating, ventilation, air conditioning and lighting, improving operational performance and reducing energy consumption.

### Mandatory Monitoring of Indoor Air Quality

France currently has no dedicated regulation requiring indoor air quality monitoring across the entire non-residential building stock as envisioned by the revised EPBD.

### Instead, indoor air quality requirements are addressed through several existing frameworks:

- Surveillance rules for public-access buildings (ERP);
- Building Automation and Control System requirements;
- ventilation requirements under RE2020.

Together, these measures address elements of indoor air quality, although no single framework fully implements the EPBD requirement.

### Further Requirements

Additional legislation supporting the implementation framework includes:

- Loi APER (2023) introducing expanded renewable energy and photovoltaic obligations for buildings and parking areas.
- Loi LOM requiring electric vehicle charging infrastructure in parking facilities associated with new and renovated buildings.



# 6. Status of Energy Certificate Adjustment

France revised its Energy Performance Certificate (Diagnostic de Performance Énergétique – DPE) methodology in 2024.

The update modifies the calculation methodology while maintaining the existing A-to-G classification system, with the objective of improving the accuracy and consistency of energy labels.

## Energy Efficiency Classes

France continues to use the harmonised A-to-G energy performance classification.

## Changes in Conversion Factors

From 1 January 2026, the primary energy conversion factor for electricity is reduced from 2.3 to 1.9, aligning the French methodology with European harmonisation objectives.

Existing valid DPE certificates can be updated through the ADEME simulator without requiring a new on-site inspection.

## Energy Performance Indicators

The French DPE combines two indicators:

- Primary Energy Consumption (kWh EP/sqm/year)
- Greenhouse Gas Emissions (kg CO<sub>2</sub>e/sqm/year)

The lower-performing indicator determines the final energy class.

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RE2020 also introduces lifecycle carbon indicators for new buildings, including embodied and operational carbon metrics.



# 7. Mandatory Solar Obligations

France's solar obligation framework was introduced through the Loi Climat et Résilience (2021) and strengthened by the Loi APER (2023).

The obligation applies to the construction, extension or major renovation of non-residential buildings with a footprint above 500 sqm, as well as covered public car parks.

For new construction, extension or major renovation, at least 30% of the roof surface must be covered with photovoltaic systems or vegetation. This increases to 40% from 1 July 2026 and 50% from 1 July 2027.

From 1 January 2028, existing non-residential buildings above 500 sqm will also be subject to these obligations, even without renovation works.

## 5.1 Exemptions

The obligation may be fulfilled through photovoltaic panels, vegetation systems or a combination of both. Exemptions apply where technical infeasibility is demonstrated.

## 5.2 New Buildings

New commercial and non-residential buildings must progressively integrate renewable energy production or vegetation on their roofs:

40% from 1 July 2026

50% from 1 July 2027

New public buildings must include photovoltaic systems from 2028, where technically feasible.

The obligation extends to all new residential buildings from 2030.

## 5.3 Existing Buildings

Existing buildings and parking areas are also covered progressively:

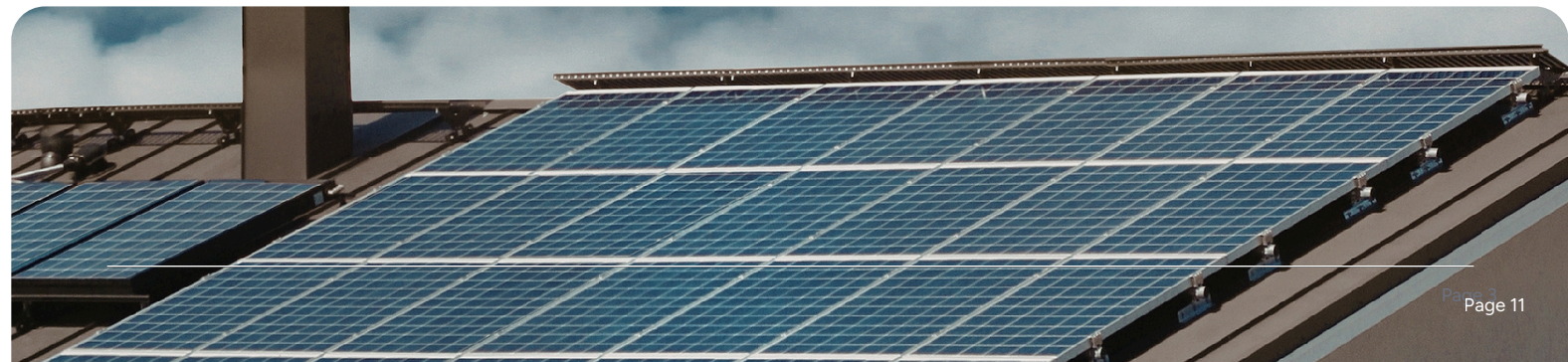
2026: Outdoor car parks above 10,000 sqm

2028: Outdoor car parks above 1,500 sqm and existing public buildings above 2,000 sqm

2029: Existing public buildings above 750 sqm

2031: Existing public buildings above 250 sqm

Non-residential buildings are also subject to the solar requirement when undergoing major renovation requiring an administrative permit.



# 8. Mandatory GWP Calculation

Under RE2020, France requires lifecycle carbon calculation for new buildings.

**The calculation includes two indicators:**

## **Ic construction**

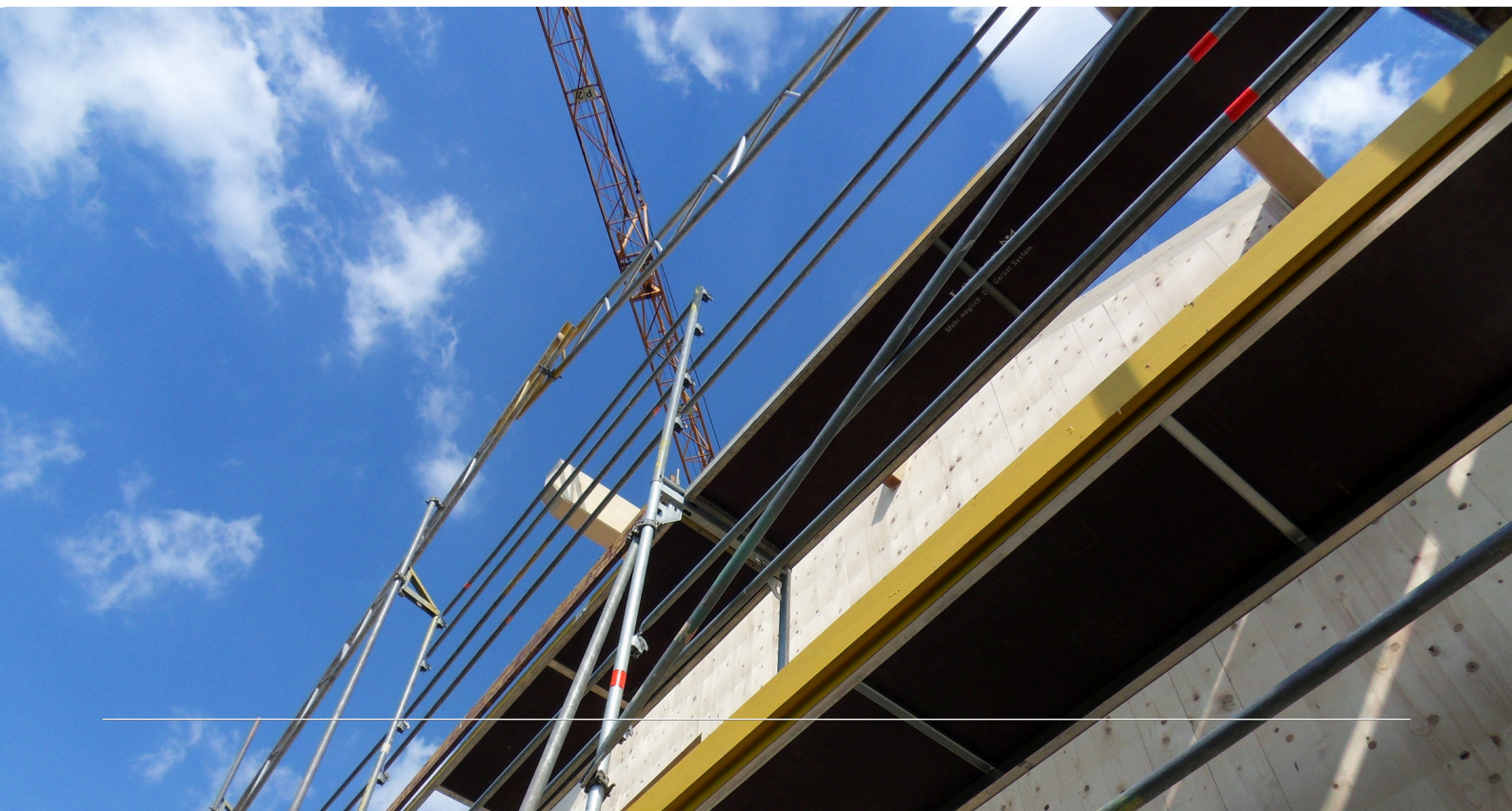
Embodied carbon from materials and site works.

## **Ic énergie**

Operational carbon over the lifecycle.

Thresholds were tightened in 2025. Environmental Product Declarations must be registered in the national INIES database and follow EN 15804+A2 methodology.

**These provisions place France ahead of the general EPBD timeline requiring GWP calculation for all new buildings by 2030.**



## 9. Definition of Zero-Emission Building in the Law-Emission Buildings

The EPBD defines zero-emission buildings as buildings with no on-site operational greenhouse gas emissions from fossil fuels and the ability to respond to external energy system signals.

France's RE2020 approaches this definition by prohibiting gas and oil heating in new residential buildings from 2022 and setting strict carbon thresholds.

However, French law does not yet explicitly use the term "zero-emission building." RE2020 buildings are considered nZEB in relation to EU Taxonomy requirements.



# 10. Compliance Documentation

In France, the Diagnostic de Performance Énergétique (DPE) is the primary document used to demonstrate energy performance.

The DPE is mandatory for property sales and rentals and must be produced by a certified diagnostician.

It is valid for 10 years, except for certificates issued before 1 July 2021, which have earlier expiry dates.

For buildings classified E, F or G that are being sold, a detailed energy audit is also required. Energy labels must be displayed in all property advertisements.

## Renovation Passport

The EPBD requires Member States to introduce renovation passports to support step-by-step deep renovations.

In France, the regulatory energy audit already fulfils many renovation passport characteristics.

### It includes:

- a physical model of the building;
- staged renovation scenarios;
- at least one pathway to Class B;
- cost estimates;
- available financial support;
- a renovation roadmap.

The audit is mandatory for the sale of single-family homes and mono-ownership buildings classified E, F or G.

It is valid for 5 years and must be produced by a certified professional.

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# Conclusion

France's implementation of the EPBD represents more than the transposition of European legislation. It builds on an already mature regulatory framework that continues to strengthen energy performance, carbon reduction and building decarbonisation across the real estate sector.

Through measures such as progressive Minimum Energy Performance Standards, the Décret Tertiaire, RE2020, mandatory Building Automation and Control Systems, expanded solar obligations and lifecycle carbon assessment, France is moving towards a more performance-driven built environment.

For real estate stakeholders, the challenge is no longer simply complying with today's requirements. It is understanding how evolving regulations will influence asset value, investment strategies, renovation planning and long-term portfolio performance.

As the regulatory landscape continues to evolve, access to reliable building data, proactive planning and asset-level insights will be essential for managing risk, maintaining competitiveness and supporting the transition to a low-carbon real estate market.

## From Regulation to Real Estate Decisions

Understanding EPBD exposure requires more than compliance tracking.

It requires visibility into how regulation may affect asset performance, future CapEx, operational risk, and long-term portfolio resilience.

Blue Auditor supports investors, lenders, asset managers, and property owners with:

- Climate Risk Analysis
- EPBD & MEPS assessments
- Transition Risk Modeling
- Retrofit Intelligence™
- Climate Value-at-Risk analysis

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