NBRP Assessment

Document 1 - Country assessment sheets

Spain · Netherlands · France · Romania · Slovenia · Poland · Belgium-Wallonia · Finland · Germany · Croatia · Denmark · Austria · Bulgaria · Sweden · Portugal

October 2026

How to read these country fiches

Each fiche runs to three pages. Page 1 introduces the plan and shows its scores: the radar gives the average score of each stream against the average of the 15 plans, with the plan's overall average in the chart title; the heatmap gives the score of every topic on each of the eight dimensions, and the topic score. Page 2 analyses the plan stream by stream. Page 3 gives the quantitative market snapshot.

The stream table on page 2 has three rows per stream. "What the plan contains" is factual and gives the detail needed to read the two rows that follow. "Flagship features" lists measures worth highlighting; "None identified" means that no measure of the stream stands out. "Priority improvements" are marked "For the final plan" when they can be made in the final NBRP due in December 2026, and "Delivery" when they concern implementation afterwards; "Not a priority at this stage" means that no improvement stands out for the stream.

Streams and topics

STREAMs		*TOPICS*
1	**Targets, standards and regulatory backbone**	1.1 National trajectory for residential buildings 1.2 Non-residential MEPS 1.3 ZEB thresholds / nZEB conversion 1.4 Fossil fuel phase out and heat decarbonisation strategy 1.5 TBS / BACS 1.6 Performance of glazed areas
2	**Delivery architecture and implementation capacity**	2.1 One-stop shops 2.2 Workforce 2.3 Area-based / integrated approaches 2.4 Mobilisation of public buildings to drive market change
3	**Finance and political attractiveness**	3.1 Financing of the investments and of the NBRP's delivery costs 3.2 Diversified and scalable financing toolbox 3.3 Mobilisation of multiple benefits
4	**Social robustness**	4.1 Proactive targeting of vulnerable households 4.2 Affordability and activation of the rental market 4.3 Social safeguards
5	**Long-term quality and future proofing**	5.1 Life-cycle climate and environmental impacts 5.2 Climate resilience

Assessment scale by dimension

Dimension	0	1	2	3

Explicitness	Absent	Implicit / vague	Explicit but partial	Explicit and operationalised
Maturity	Absent	Intentional / aspirational	Preparation / pilot	Scaled implementation
Quantitative ambition	No quantification	Limited / symbolic	Scaled	Backcasting from 2050
Delivery credibility	No implementation logic	Partial logic	At least three of the five criteria*	Four criteria, including compliance*
Social robustness	No safeguards, no focus on vulnerable groups	Limited social dimension	Meaningful	Strong and operational
Scalability / leverage	No scaling pathway	Limited scaling pathway	Credible scaling pathway	Explicit leverage (multiplier, private capital, market structuring)
Integration / coherence	Siloed	Reference to another policy	A concrete coupling mechanism**	Several coupling mechanisms**
Evaluability	Not monitorable	Weakly monitorable	Monitorable with gaps	Clearly monitorable

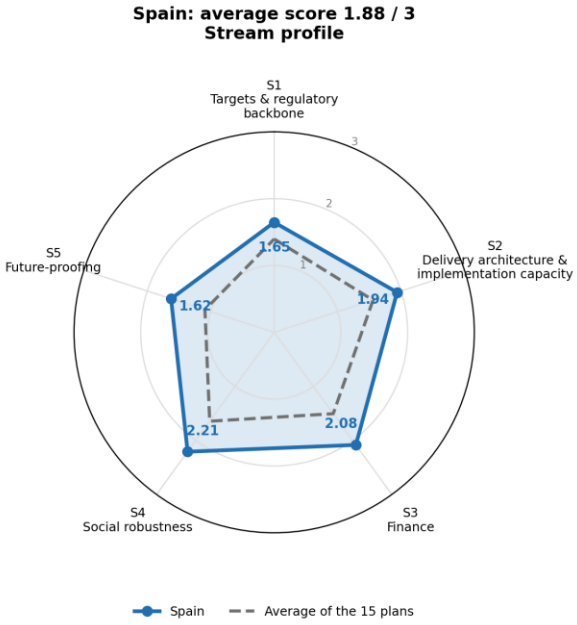
** Five criteria: actors, timeline, resources, compliance, monitoring. ** Conditional aid, figures derived from another policy, co-financing or a joint obligation.*

Reading notes

- The analysis covers what each NBRP contains. Where a country has mature policies outside the plan that the plan does not make explicit (typically Denmark), this is flagged in a reading note.
- Observations shared by several plans, and the transversal priority improvements, are developed in Document 2 and are not restated here unless they matter specifically for the country.
- A country's average score is the equal-weighted average of its 18 topic scores, not of its five stream scores. Stream 5 has two topics against six in Stream 1, so it weighs less in the average.
- Scores reflect each draft NBRP as submitted, not the current state of implementation (see Document 2, "From planning to implementation").

Spain

The Spanish NBRP sets a residential trajectory backcast to 2050, minimum energy performance standards (MEPS) by use and climate zone for non-residential buildings, an investment plan of €39.35bn for 2026-2030 split between public and private sources, and a €3bn measure for vulnerable households. Its main open points are the zero-emission building (ZEB) values, which the plan labels tentative, the Royal Decrees that will carry MEPS enforcement, still at an early stage, and financing instruments that remain at feasibility stage without a budget.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	**Topic score**
T1.1 National trajectory for residential buildings	3	2	3	2	2	2	3	2	**2.4**
T1.2 MEPS for non-residential buildings	3	2	3	2	0	2	2	2	**2.0**
T1.3 ZEB thresholds / nZEB conversion	2	2	2	1	0	1	1	1	**1.3**
T1.4 Fossil-fuel phase-out and heat decarbonisation	2	2	2	2	1	2	2	2	**1.9**
T1.5 TBS and BACS requirements	2	2	1	2	1	2	1	2	**1.6**
T1.6 Performance of glazed areas	1	1	0	1	0	1	1	1	**0.8**
T2.1 One-stop shops	2	2	2	2	2	2	2	2	**2.0**
T2.2 Workforce	2	2	2	2	1	2	1	1	**1.6**
T2.3 Area-based / integrated approach	2	2	2	2	2	2	3	2	**2.1**
T2.4 Mobilisation of public buildings	3	2	2	2	1	2	2	2	**2.0**
T3.1 Financing of investments and needs	3	2	3	2	3	2	3	2	**2.5**
T3.2 Diversified and scalable financing	3	2	2	2	2	3	1	2	**2.1**
T3.3 Mobilisation of multiple benefits	3	2	2	1	2	0	1	2	**1.6**
T4.1 Proactive targeting of vulnerable households	3	2	2	2	3	2	3	2	**2.4**
T4.2 Affordability and activation of the rental market	3	2	2	2	2	2	3	1	**2.1**
T4.3 Social safeguards	3	2	1	2	3	2	3	1	**2.1**
T5.1 Life-cycle climate and environmental impacts	2	1	1	2	1	1	2	1	**1.4**
T5.2 Climate resilience	3	2	0	2	2	2	3	1	**1.9**

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.6	**What the plan contains.** Residential trajectory backcast to 2050: 17.8 million dwellings renovated cumulatively, average consumption down to 22 kWh/m²·yr. Non-residential: 40.8% of the tertiary stock renovated by 2030, 62.4% by 2040 and 84% by 2050 (cumulative shares). MEPS in kWh/m²·yr by use and climate zone, for 2030 to 2050. Public buildings: 3% a year (Energy Efficiency Directive, EED, Art. 6). Zero-emission building (ZEB) values are labelled tentative pending the Commission's methodology. Technical building systems (TBS) and building automation and control systems (BACS) are addressed without the EPBD Article 13 thresholds. No window performance requirement is stated.
	Flagship features. MEPS by use and climate zone: thresholds for two use categories in four climate zones, from 84-294 kWh/m²·yr in 2030 to 41-96 in 2050.
	Priority improvements. **For the final plan:** Set final ZEB values, or the procedure and date to adopt them once the Commission methodology is out. **For the final plan:** Specify how BACS requirements apply (systems above 290 kW by end-2024, above 70 kW by end-2029): scope, functions, verification. **Delivery:** Make MEPS controls and sanctions operational; the Royal Decree carrying them is at an early stage.
S2 **Delivery architecture & implementation capacity** Score 1.9	**What the plan contains.** One-stop shops: the 2030 coverage objective restates the EPBD Article 18 criteria (one office per 80,000 inhabitants, per region, in older-stock and neighbourhood-renewal areas, within 90 minutes); no number of offices, staff or throughput is derived from them. Budget: €0.45m to plan the network, €51.0m to reinforce and create offices (€34.2m central government, €16.8m autonomous communities), €2.0m of technical assistance. Workforce: about 700,000 additional workers needed (National Construction Confederation); no training target. Area-based renovation is linked to the Urban Agenda and local heating plans.
	Flagship features. Neighbourhood-scale aid: aid lines for renovation at neighbourhood or district level, beyond building-by-building projects; a first line sits in the State Housing Plan 2026-2030, financed 60% by the Ministry of Housing and 40% by the autonomous communities.
	Priority improvements. **For the final plan:** Translate the coverage criteria into a number of offices, staff and budget per region, with a throughput target. **For the final plan:** Turn the 700,000-worker need into annual training targets by profile and region, and size training accordingly. **Delivery:** Give the one-stop-shop network stable funding beyond Next Generation EU funds.
S3 **Finance & political attractiveness** Score 2.1	**What the plan contains.** Investment of €39.35bn for 2026-2030 (€11.31bn public, €28.04bn private) across seven policy areas. Public funding by level: €5.99bn regional and local, €4.18bn national, €1.13bn EU. The private amount follows a fixed rule: 75% split equally between own funds, mortgages and unsecured loans, 15% energy performance contracting, 10% energy savings certificates. Operational: Official Credit Institute (ICO) guarantees, energy savings certificates, community loans. At feasibility stage, without budget: PACE, on-bill financing, an insured life efficient mortgage (HEVA), co-investment, energy-savings insurance.
	Flagship features. Multiple benefits quantified ex ante (MICATool): energy-poor households down 21.88% by 2030, 2,794 deaths from pollution avoided, GDP up 0.54% cumulatively over 2023-2030, €5.55bn of household bill savings over 2020-2030.
	Priority improvements. **For the final plan:** Date the feasibility studies on PACE, on-bill, HEVA, co-investment and insurance, and the point at which budgets will be decided. **For the final plan:** Replace the 75/15/10 rule with volumes per instrument. **Delivery:** Track multiple benefits ex post and use them to design instruments.
S4 **Social robustness** Score 2.2	**What the plan contains.** Measure 2.1.1 for vulnerable households (€3bn, central government): subsidies rising with vulnerability and paid directly to contractors, tax incentives, compatibility with social benefits, express-renovation pilots, climate shelters. Official metrics put 3.5 to 8.1 million people in energy poverty; the plan expects a 21.88% fall in energy-poor households by 2030. Rental: aid for vacant homes let at social or affordable rent for five years; rent may rise after renovation saving at least 30% of energy (Law 12/2023). The State Housing Plan 2026-2030 earmarks 30% of its €7bn for renovation, covering over 260,000 dwellings.
	Flagship features. Direct payment to contractors for vulnerable households (Measure 2.1.1, €3bn): aid intensity rises with vulnerability and households do not have to pre-finance works.
	Priority improvements. *Not a priority at this stage.*
S5 **Long-term quality & future-proofing** Score 1.6	**What the plan contains.** Life-cycle carbon: route to transpose EPBD Article 7, with global warming potential (GWP) limit values left to a national roadmap; a Strategic Project for Economic Recovery and Transformation (PERTE) on housing industrialisation. Climate resilience: dedicated section 8.1, with climate shelters for vulnerable people without cooling.
	Flagship features. Dedicated climate-resilience section linked to the National Climate Change Adaptation Plan.
	Priority improvements. *Not a priority at this stage.*

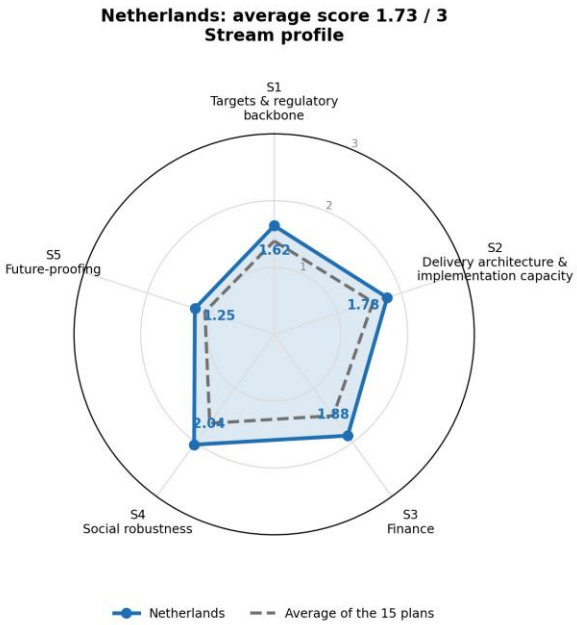
Quantitative market snapshot

Indicator	Up to 2030	After 2030
Residential renovation rate	Target in 2030: 445,500 dwellings a year (148,500 buildings, 47.4 million m²)	5.46 million dwellings over 2031-2040 (1.82 million buildings, 582 million m²)
Residential renovation depth	In 2030: 30,000 deep, 91,695 medium and 323,805 light renovations	Over 2031-2040: 270,000 deep, 690,680 medium and 4,504,120 light renovations
Non-residential renovation	No annual rate target. Observed rate 0.69% a year (2023). Target: 40.8% of the tertiary stock renovated by 2030 (cumulative share)	62.4% of the tertiary stock by 2040 and 84% by 2050 (cumulative shares)
Residential investment need	€14.74bn over 2026-2030	€15.31bn over 2031-2035
Non-residential investment need	€22.88bn over 2026-2030	€23.78bn over 2031-2035
Public finance	€11.31bn over 2026-2030, residential and non-residential together (not split by building type)	Not stated in the plan
Private finance	€28.04bn over 2026-2030, residential and non-residential together, allocated by the 75/15/10 rule (see stream 3)	Not stated in the plan
One-stop shops	Coverage objective restates the EPBD Article 18 criteria; number of offices, staff and annual throughput not stated. Budget €53.45m: planning €0.45m, offices €51.0m, technical assistance €2.0m	Not stated in the plan
Workforce need	About 700,000 additional workers to meet current construction demand (National Construction Confederation estimate)	Almost 740,000 job openings in construction over 2023-2035

Sources: Spanish draft NBRP (parts I to III); figures as stated in the plan.

Netherlands

The Dutch NBRP relies mainly on instruments already in force: minimum energy performance standards for non-residential buildings, a legal maximum rent linked to the energy label, and a financing toolbox with reported public spending. Investment needs are given to 2050 with a public and private split, but with an identical amount for each year of 2026-2030 and no public funding after 2030. Life-cycle carbon limit values are not set, and climate-resilience targets are deferred to the 2026 revision of the National Climate Adaptation Strategy (NAS'26).



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	**Topic score**
T1.1 National trajectory for residential buildings	3	2	3	2	1	3	1	3	**2.3**
T1.2 MEPS for non-residential buildings	3	3	2	3	0	2	1	2	**2.0**
T1.3 ZEB thresholds / nZEB conversion	2	2	2	1	0	2	1	2	**1.5**
T1.4 Fossil-fuel phase-out and heat decarbonisation	2	2	2	2	2	2	2	2	**2.0**
T1.5 TBS and BACS requirements	1	1	1	1	0	0	1	1	**0.8**
T1.6 Performance of glazed areas	1	2	1	2	1	1	1	1	**1.3**
T2.1 One-stop shops	2	3	1	2	2	2	2	1	**1.9**
T2.2 Workforce	2	2	1	1	1	2	1	2	**1.5**
T2.3 Area-based / integrated approach	2	2	2	2	2	2	2	2	**2.0**
T2.4 Mobilisation of public buildings	3	2	2	2	1	1	1	2	**1.8**
T3.1 Financing of investments and needs	2	2	3	2	1	2	2	2	**2.0**
T3.2 Diversified and scalable financing	2	3	2	2	2	3	1	2	**2.1**
T3.3 Mobilisation of multiple benefits	2	2	1	2	2	0	1	2	**1.5**
T4.1 Proactive targeting of vulnerable households	3	2	2	2	3	2	2	2	**2.3**
T4.2 Affordability and activation of the rental market	3	2	2	2	3	2	2	2	**2.3**
T4.3 Social safeguards	2	2	2	2	2	1	1	1	**1.6**
T5.1 Life-cycle climate and environmental impacts	2	2	1	2	0	2	1	1	**1.4**
T5.2 Climate resilience	2	2	0	2	1	1	1	0	**1.1**

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.6	**What the plan contains.** Residential trajectory backcast to 2050: 0.35 million renovations a year in 2020-2030, 0.5 million in 2030-2040 and 0.36 million in 2040-2050, with a sub-trajectory for the worst-performing 43% of dwellings; the 2050 milestone is zero. Non-residential MEPS for utility buildings: label D by 2030 and C by 2033 (worst 16% and 26%), not all buildings covered; offices need label C since 2023 (71% with a registered label in 2024). Public buildings: 3% a year (Energy Efficiency Directive, EED, Article 6). No zero-emission building (ZEB) definition for existing buildings, only a voluntary Renovation Standard (at most 225 kWh/m²·yr of fossil primary energy). No dedicated measure on building automation (BACS) or technical systems (TBS); no window requirement stated.
	Flagship features. Non-residential MEPS in regulation: label D by 2030 and label C by 2033 for utility buildings, with the office label-C obligation in force since 2023.
	Priority improvements. **For the final plan:** Add a BACS and TBS measure linking national requirements to buildings covered, deadlines and compliance checks. **For the final plan:** Set a binding ZEB standard for existing buildings in place of the voluntary Renovation Standard. **For the final plan:** Explain the zero renovation milestone for 2050.
S2 **Delivery architecture & implementation capacity** Score 1.8	**What the plan contains.** One-stop shops: energy counters in almost every municipality, without throughput target or staffing figures; a unified "Energy House" model is under design. Area-based: natural-gas-free neighbourhoods and the local track of the National Insulation Programme (about €1.6bn for vulnerable neighbourhoods, 2022-2030), with municipal powers under the Municipal Instruments for the Heat Transition Act (Wgiw) and a capacity grant (CDOKE). Public buildings: solar panels on central-government roofs and the DUMAVA subsidy for public and social buildings (€1.9bn, 2024-2030); no energy-use figures for government buildings. Workforce: target of about 5,000 additional technicians.
	Flagship features. Municipality-led switch-off from gas: neighbourhood programmes with legal powers, a capacity grant and insulation funds for vulnerable neighbourhoods; about 500,000 new heat-network connections by 2030.
	Priority improvements. **For the final plan:** Set an annual throughput target for the energy counters and a date for the unified Energy House model. **For the final plan:** Quantify the workforce need beyond technicians and size the training effort accordingly. **Delivery:** Report energy use and savings for central-government buildings.
S3 **Finance & political attractiveness** Score 1.9	**What the plan contains.** Investment need of €5.3bn a year in 2026-2030 (€3.0bn residential, €2.3bn non-residential), identical each year; then about €6.9bn a year in 2031-2040 (€8.0bn in 2034-2035) and €5.6bn in 2041-2050 (annualised from period totals). Public funding falls from €1.42bn in 2026 to €0.90bn in 2030 and is nil after 2030. Grid investment is excluded. Operational: National Heat Fund loans, ISDE subsidy (€2.25bn, 2026-2030), SDE++ (€4.33bn), EIA tax deduction (€842m), heat-network guarantee (GRW) and subsidy (WIS, €1.6bn), reduced VAT. Energy poverty monitored since 2019, without a reduction target.
	Flagship features. Toolbox with reported spending and leverage: ISDE (€512m of subsidy associated with €1.94bn of private investment), SDE++, National Heat Fund loans.
	Priority improvements. **For the final plan:** Give year-by-year figures for 2026-2030 and explain how private finance takes over when public funding stops after 2030. **For the final plan:** Set a numeric target for reducing energy poverty.
S4 **Social robustness** Score 2.0	**What the plan contains.** Vulnerable households: an energy-poverty grant to municipalities (SPUK), the insulation programme's local track, the Social Climate Plan (concept), outreach through trusted intermediaries. Rental market: the Affordable Rent Act (1 July 2024) links the legal maximum rent to the energy label through the mandatory points system (WWS); energy performance fee (EPV); phase-out of labels E, F and G in rental housing. Safeguards: €3.8bn energy price cap, Social Climate Fund income support, mitigation of the emissions trading system for buildings (ETS2). Affordable housing is delivered by housing corporations.
	Flagship features. Rent linked to the energy label: since 1 July 2024 the legal maximum rent depends on the dwelling's label.
	Priority improvements. *Not a priority at this stage.*
S5 **Long-term quality & future-proofing** Score 1.3	**What the plan contains.** Circular economy: a fully circular construction sector by 2050 and 50% industrialised construction by 2030. Whole-life carbon limit values are not set in the plan. Climate resilience: the National Climate Adaptation Strategy names four tasks for the built environment; sector targets and indicators are deferred to NAS'26 and not linked to renovation.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Bring building-level climate-resilience targets into the plan rather than deferring them to NAS'26, and integrate resilience into renovation packages and neighbourhood programmes.

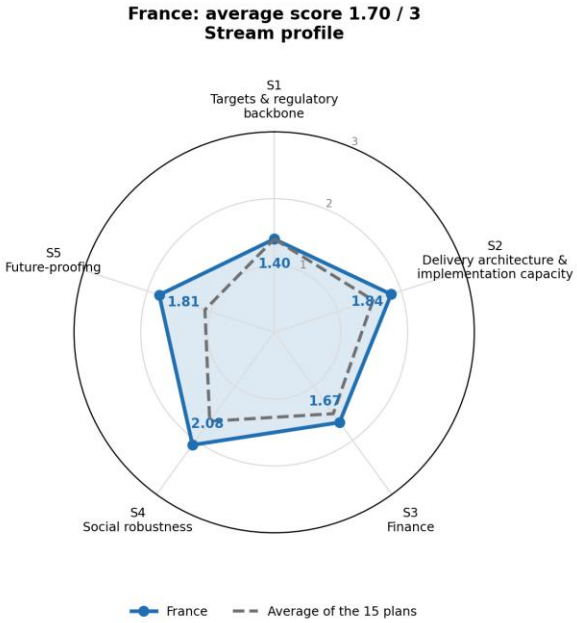
Quantitative market snapshot

Indicator	Up to 2030	After 2030
Residential renovation rate	0.35 million renovations a year in 2020-2030 (42 million m²)	0.5 million a year in 2030-2040 (60 million m²) and 0.36 million a year in 2040-2050 (43 million m²); 2050 milestone set at zero
Non-residential renovation	No renovation-rate target: MEPS instead. Utility buildings at least label D by 2030 (worst 16%). Offices at least label C since 2023; 71% of offices with a registered label in 2024	Utility buildings at least label C by 2033 (worst 26%)
Residential investment need	€3.0bn a year (2026-2030)	€4.5bn a year in 2031-2040, €3.3bn a year in 2041-2050 (annualised)
Non-residential investment need	€2.3bn a year (2026-2030)	€2.3bn a year in 2031-2033 and 2036-2050, €3.5bn a year in 2034-2035 (annualised)
Public finance	€1.42bn in 2026 falling to €0.90bn in 2030 (national €1.21bn to €0.70bn, local €0.20bn a year). Programmes cited: DUMAVA €1.9bn (2024-2030), WIS €1.6bn, insulation local track about €1.6bn	None stated in the plan for 2031-2050
Private finance	€3.90bn in 2026 rising to €4.41bn in 2030 (own funds and mortgages)	All of the need: €6.9bn a year in 2031-2033 down to €5.6bn a year in 2041-2050
One-stop shops	Municipal energy counters in almost every municipality; no throughput target or staffing figures; unified Energy House model under design	Not stated in the plan
Workforce need	No overall figure; target of about 5,000 additional technicians	Not stated in the plan
Heating systems	About 1.4 million homes gas-free or hybrid by 2030; about 500,000 new heat-network connections; hybrid heat pump mandatory for companies and organisations since 1 July 2023 (recognised-measures list)	About 6 million homes gas-free by 2050

Sources: Dutch draft NBRP (Concept, March 2026), Annex II investment table and Section 7; annual figures after 2030 are the plan's period totals divided by the number of years.

France

The French NBRP relies on instruments in force: a ban on renting the worst energy classes under the decent-housing standard, the income-scaled MaPrimeRénov' grant combined with energy savings certificates and a zero-interest loan, and the France Rénov' one-stop-shop network. The plan document leaves several mandatory parts open: the detailed residential trajectory, the non-residential MEPS and the ZEB thresholds are marked as being defined, and the public and private financing lines of the Annex II table are returned as not available.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	Topic score
T1.1 National trajectory for residential buildings	2	2	3	2	2	2	1	3	2.1
T1.2 MEPS for non-residential buildings	1	1	1	1	0	1	1	1	0.9
T1.3 ZEB thresholds / nZEB conversion	1	1	1	1	0	1	1	1	0.9
T1.4 Fossil-fuel phase-out and heat decarbonisation	2	2	2	2	1	2	1	3	1.9
T1.5 TBS and BACS requirements	3	2	2	2	0	2	1	1	1.6
T1.6 Performance of glazed areas	2	2	0	2	0	1	1	0	1.0
T2.1 One-stop shops	3	3	2	2	2	2	2	2	2.3
T2.2 Workforce	2	2	2	2	1	1	2	1	1.6
T2.3 Area-based / integrated approach	2	3	2	3	2	1	1	2	2.0
T2.4 Mobilisation of public buildings	2	2	1	2	0	2	1	2	1.5
T3.1 Financing of investments and needs	2	2	2	2	1	2	2	1	1.8
T3.2 Diversified and scalable financing	3	3	2	3	2	2	2	1	2.3
T3.3 Mobilisation of multiple benefits	2	1	1	0	2	0	1	1	1.0
T4.1 Proactive targeting of vulnerable households	2	3	1	2	2	2	2	2	2.0
T4.2 Affordability and activation of the rental market	3	3	2	3	3	3	2	2	2.6
T4.3 Social safeguards	2	2	1	2	2	1	2	1	1.6
T5.1 Life-cycle climate and environmental impacts	3	3	2	3	0	2	3	2	2.3
T5.2 Climate resilience	2	2	1	1	1	1	2	1	1.4

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.4	**What the plan contains.** Renovation-rate targets: residential 2.19% of dwellings a year in 2030, 1.28% in 2040 and 1.26% in 2050, against an observed 1.01%; non-residential 8.70% of floor area a year throughout. The detailed residential trajectory (Part VII), the worst-43% and depth targets are not filled. Non-residential MEPS (Part VI) are "being defined"; the tertiary decree (Éco-Énergie Tertiaire: consumption −40% by 2030, −50% by 2040, −60% by 2050) is cited as a proxy. ZEB thresholds are not included (Part V). BACS decree in force. Windows: minimum performance for replaced windows under the element-by-element rules (RT-ex), value not stated. Heating: 300,000 oil boilers replaced a year by 2030; no end date for gas boilers (36% of dwellings).
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Set tertiary MEPS thresholds in kWh/m² with a compliance mechanism (Part VI). **For the final plan:** Define ZEB thresholds and the path from RE2020 to the EPBD ZEB requirements (Part V). **For the final plan:** Fill the residential trajectory (worst-43%, depth) and set an end date for gas boilers consistent with the 2040 fossil-boiler phase-out.
S2 **Delivery architecture & implementation capacity** Score 1.8	**What the plan contains.** One-stop shops: the France Rénov' network covers 1,164 intercommunal authorities (EPCI, 92%), co-funded 50% by the national housing agency (Anah) and 50% by local authorities, with household support by a certified adviser (Mon Accompagnateur Rénov'); 165,600 individual and 246,100 collective accompaniments targeted in 2024-2026. Area-based: the New National Urban Renewal Programme (NPNRU, €12bn since 2014, 80% committed by end-2025) and EcoQuartier; both are urban-renewal programmes and their energy-renovation share is not reported. Public buildings: green fund (Fonds vert) and the tertiary decree. Workforce: 170,000-250,000 additional full-time equivalents needed by 2030; RGE quality label and FEEBAT training; no training output target.
	Flagship features. National one-stop-shop network with mandatory accompaniment: France Rénov' covers 92% of intercommunal areas, and a certified adviser is mandatory for deep renovations supported by MaPrimeRénov'.
	Priority improvements. **For the final plan:** Attach a training output target to the 170,000-250,000 FTE need and size the RGE and FEEBAT channels accordingly.
S3 **Finance & political attractiveness** Score 1.7	**What the plan contains.** Investment need given as a single annual level for 2030: €34bn a year residential and €10bn non-residential, against €15bn and €2bn invested in 2024; no trajectory. The Annex II public and private financing lines are returned as not available. Sources are given instrument by instrument: Anah spent €3bn in 2025 (€2.1bn on energy renovation), plus energy savings certificates (CEE, an obligation on energy suppliers) without an aggregate amount. Instruments in operation: MaPrimeRénov' (about 300,000 dwellings in 2025, amounts scaled to income), CEE and the zero-interest eco-loan (éco-PTZ). Energy poverty is quantified (10.8% of households); multiple benefits are listed, not quantified.
	Flagship features. Income-scaled MaPrimeRénov' toolbox: about 300,000 dwellings supported in 2025, of which more than 100,000 deep renovations, three pathways including condominiums, combined with CEE and éco-PTZ.
	Priority improvements. **For the final plan:** Fill the public and private financing lines and give an investment trajectory, not only a 2030 level. **For the final plan:** Quantify the wider benefits of renovation and use them to target and allocate aid.
S4 **Social robustness** Score 2.1	**What the plan contains.** Rental market: the decent-housing standard makes renting the worst classes progressively illegal (minimum class F from 2025, E from 2028, D from 2034), concerning about 3.7 million rented dwellings, 1.4 million of them F or G by 2028; enforcement relies on tenants and judges. Vulnerable households: income-scaled MaPrimeRénov' and Anah aid, France Rénov' targeting of modest households, the energy cheque (chèque énergie). Social housing: eco-loan for social housing (éco-PLS, €6bn), fund for the energy renovation of social housing (FREPS, €378m) and the Nord mining-basin programme (ERBM, 31,000 dwellings), without a single affordable-housing plan.
	Flagship features. Ban on renting the worst energy classes: minimum class F from 2025, E from 2028 and D from 2034 under the decent-housing standard; a tenant can compel works and a judge can order them.
	Priority improvements. *Not a priority at this stage.*
S5 **Long-term quality & future-proofing** Score 1.8	**What the plan contains.** Life-cycle carbon: the RE2020 regulation caps the embodied carbon of new buildings (dwellings, offices and schools since 2022, thirteen further building types from May 2026), tightened every three years to 2031 (about −35%), and promotes bio-based materials; no life-cycle target for renovation. Climate resilience: RE2020 summer-comfort requirement and heat-adaptation criteria in the 2026 aid rules; no dedicated adaptation instrument.
	Flagship features. Life-cycle carbon limits for new buildings (RE2020), in force since 2022 and tightened every three years.
	Priority improvements. *Not a priority at this stage.*

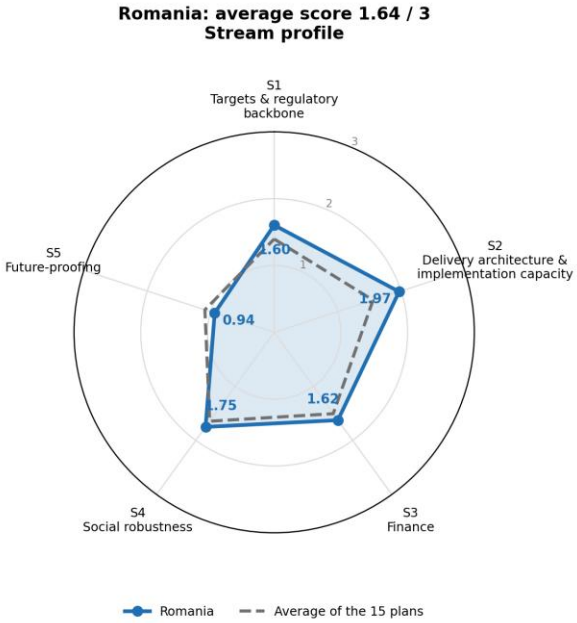
Quantitative market snapshot

Indicator	Up to 2030	After 2030
Residential renovation rate	Target 2.19% of dwellings a year in 2030; observed 1.01% a year	1.28% a year in 2040, 1.26% in 2050
Residential renovation depth	About 300,000 dwellings supported by MaPrimeRénov' in 2025, of which more than 100,000 deep renovations; no depth target	Not stated in the plan
Non-residential renovation	Target 8.70% of floor area a year. Tertiary decree: consumption −40% by 2030. BACS: 395 million m² of tertiary floor area equipped by 2030	8.70% a year to 2050. Tertiary decree: −50% by 2040, −60% by 2050
Residential investment need	€34bn a year in 2030 (target level), against €15bn invested in 2024	Not stated in the plan
Non-residential investment need	€10bn a year in 2030 (target level), against €2bn invested in 2024	Not stated in the plan
Public finance	Anah €3bn in 2025 (€2.1bn energy renovation), of which about €2.7bn from the State; energy savings certificates not aggregated; Annex II public lines not available	Not stated in the plan
Private finance	Not stated in the plan (Annex II private lines not available)	Not stated in the plan
One-stop shops	1,164 intercommunal authorities covered (92%) at 17 December 2025; co-funded 50% Anah, 50% local authorities; 165,600 individual and 246,100 collective accompaniments in 2024-2026	Target of 100% coverage, without a date
Workforce need	170,000-250,000 additional FTE by 2030 compared with 2023; recruitment need of 597,000 over 2019-2030	Not stated in the plan
Heating systems	300,000 oil boilers replaced a year by 2030; new systems at most 300 gCO_2eq/kWh since 2022	Heat networks: 300,000-360,000 new connections a year by 2035; no end date for gas boilers
Residential stock	About 30.7 million dwellings, of which 14.0 million in the worst-performing segment	Not applicable

Sources: French NBRP and its data annex; figures as stated in the plan.

Romania

The Romanian NBRP publishes numeric regulatory thresholds (MEPS, ZEB per building type and climate zone, window U-values), a 2020-2050 trajectory, an investment need of €122-125bn to 2050 including enabling costs, and a costed network of 42 one-stop shops planned to reach about 100 by 2035. Monitoring and enforcement are written as options, the financing instruments are not yet sequenced, and whole-life carbon and climate resilience remain at an early stage.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	Topic score
T1.1 National trajectory for residential buildings	3	2	3	2	2	2	2	2	2.3
T1.2 MEPS for non-residential buildings	3	2	3	2	1	2	1	2	2.0
T1.3 ZEB thresholds / nZEB conversion	3	2	2	2	0	1	1	3	1.8
T1.4 Fossil-fuel phase-out and heat decarbonisation	1	2	1	1	1	1	2	1	1.3
T1.5 TBS and BACS requirements	2	1	1	1	0	1	1	1	1.0
T1.6 Performance of glazed areas	2	2	1	2	1	1	1	1	1.4
T2.1 One-stop shops	3	2	2	2	3	2	3	2	2.4
T2.2 Workforce	3	2	2	2	0	2	1	2	1.8
T2.3 Area-based / integrated approach	3	2	2	2	2	2	3	2	2.3
T2.4 Mobilisation of public buildings	2	1	2	2	0	2	2	1	1.5
T3.1 Financing of investments and needs	3	2	3	2	2	2	1	3	2.3
T3.2 Diversified and scalable financing	2	1	2	1	1	2	1	1	1.4
T3.3 Mobilisation of multiple benefits	2	1	1	1	2	0	2	1	1.3
T4.1 Proactive targeting of vulnerable households	3	2	2	2	3	2	2	2	2.3
T4.2 Affordability and activation of the rental market	2	1	1	1	2	1	2	1	1.4
T4.3 Social safeguards	2	1	1	2	2	1	2	2	1.6
T5.1 Life-cycle climate and environmental impacts	2	1	1	1	0	1	2	1	1.1
T5.2 Climate resilience	1	1	0	1	1	1	1	0	0.8

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.6	**What the plan contains.** Residential trajectory 2020-2050 with five milestones and a separate track for the worst-performing 43% of buildings; renovation-depth mix 2026-2030: 5% light, 57% medium, 38% deep. Non-residential MEPS thresholds: 422 kWh/m²·yr (worst 16%, T16) and 340 kWh/m²·yr (worst 26%, T26). ZEB thresholds per building type and five climate zones, for new and renovated buildings, set at nZEB minus 10%. Windows: U-value at most 1.10 W/m²·K. BACS: 290 kW threshold introduced, obligation not yet settled. Monitoring and enforcement (chapter 3.1.5) are set out as indicative options; MEPS enforcement depends on secondary legislation not yet adopted.
	Flagship features. Numeric thresholds in the draft: MEPS of 422 and 340 kWh/m²·yr, ZEB values per building type and climate zone, and a window U-value of at most 1.10 W/m²·K.
	Priority improvements. **For the final plan:** Turn chapter 3.1.5 into a monitoring and enforcement framework: name the accountable body, fix the indicators and reporting cadence, and schedule the secondary legislation on which MEPS enforcement depends. **For the final plan:** Link the medium and deep share of the trajectory to envelope performance requirements and support conditions.
S2 **Delivery architecture & implementation capacity** Score 2.0	**What the plan contains.** One-stop shops: 42 offices in operation (one per county and one in Bucharest), legal basis Government Emergency Ordinance 92/2024; expansion to about 100 offices by 2035; €250,000 per new office and €250,000 a year to operate (2026-2035), then €100,000. Workforce: BUS4RoBOOST roadmap to upskill or reskill more than 160,000 workers by 2030, including 79,963 unskilled workers; inter-ministerial memorandum being signed. Area-based: district programmes with annual indicators for 2026-2030 (floor area, depth, renewable share, district-heating connections, energy-poverty targeting). Evidence base: the plan rests on a one-off extraction of about 500,000 energy performance certificates; the National Digital Building Register began in December 2025.
	Flagship features. Costed one-stop-shop network: 42 offices running, about 100 by 2035, with unit costs for creating and operating each office. District programmes with annual indicators for 2026-2030.
	Priority improvements. **For the final plan:** Set a data-provision obligation and clear responsibilities to feed the National Digital Building Register.
S3 **Finance & political attractiveness** Score 1.6	**What the plan contains.** Investment need of €122-125bn to 2050, €31bn by 2030, broken down by period (Table 4.2.4), with a separate "Other Funding" line for one-stop shops, vulnerable households, technical assistance, administration and awareness. Over 2026-2035, public financing €29.77bn and private €17.75bn, not split by building type. Financing instruments (energy service companies, energy performance contracts, guarantees, green mortgages, state-guaranteed loans, on-bill recovery) are described but not assigned to institutions or timelines.
	Flagship features. Investment need to 2050 with a separate line for enabling costs (one-stop shops, technical assistance, vulnerable households, administration, awareness).
	Priority improvements. **For the final plan:** Sequence the financing instruments: which come first, through which institutions, on which timetable.
S4 **Social robustness** Score 1.8	**What the plan contains.** Vulnerable households: priority in one-stop shops, energy-poverty definition in Ordinance 92/2024, vouchers under Recovery and Resilience Plan investments I4 and I7, planned link with the Social Climate Fund; social safeguards set out in Table 3.3.11. Rental market: split incentives recognised; the plan points to model clauses, cost-sharing in homeowners' associations and landlord-tenant frameworks, without binding instruments.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Turn the split-incentive approach into binding instruments with an implementation route for rented homes and homeowners' associations.
S5 **Long-term quality & future-proofing** Score 0.9	**What the plan contains.** Whole-life carbon: chapter 3.18 sets out the framework; no GWP limit values, methodology and data at design stage. Climate resilience: overheating addressed in the nZEB envelope requirements and seismic risk in the Recovery and Resilience Plan (component C5), without a dedicated chapter.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Bring climate resilience into a dedicated section with risk mapping.

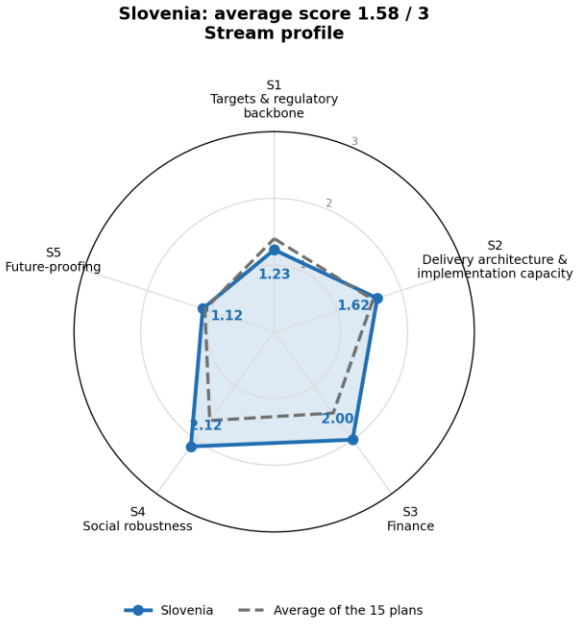
Quantitative market snapshot

Indicator	Up to 2030	After 2030
Residential renovation rate	18.06 million m² a year (2.75% of floor area); worst-performing 43%: 14.58 million m² a year (2.22%)	Trajectory to 2050 with five milestones
Residential renovation depth	2026-2030: 5% light, 57% medium, 38% deep	Not stated in the plan
Non-residential renovation	2.33 million m² a year (3.76% of floor area); worst-performing segment 1.95 million m² a year (3.15%)	Trajectory to 2050 with five milestones
Residential investment need	€26.25bn over 2026-2030 (worst-performing 43%: €24.46bn)	€39.91bn over 2026-2035 (cumulative, incl. 2026-2030)
Non-residential investment need	€2.32bn over 2026-2030 (worst-performing: €1.94bn)	€4.41bn over 2026-2035 (cumulative, incl. 2026-2030)
Public finance	Not split by period or building type	€29.77bn over 2026-2035, all buildings
Private finance	Not split by period or building type	€17.75bn over 2026-2035, all buildings
One-stop shops	42 offices in operation, 60 new planned; €250,000 per new office, €250,000 a year operating cost	About 100 offices by 2035; €100,000 a year operating cost after 2035; semi-annual reporting to the Ministry of Development
Workforce need	More than 160,000 workers to upskill or reskill by 2030, including 79,963 unskilled	Not stated in the plan
Building stock	Residential: 5.05 million buildings, 657.0 million m² (2020); worst 43%: 2.07 million buildings, 282.5 million m². Non-residential: 242,455 buildings, 62.0 million m²	Not applicable

Sources: Romanian draft NBRP; figures as stated in the plan.

Slovenia

The Slovenian NBRP treats energy performance, seismic safety, indoor quality and social aspects as one renovation logic. It quantifies investment needs and deficits by sector to 2050, funds energy-poor households at 100% through its Social Climate Plan, and reports openly on missed targets (6 of 9 for 2020). MEPS and ZEB thresholds are still at methodology stage, financing sources are named only up to the end of the Recovery and Resilience Plan in 2026, and whole-life carbon and resilience targets are not quantified.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	**Topic score**
T1.1 National trajectory for residential buildings	2	2	3	2	1	2	3	2	**2.1**
T1.2 MEPS for non-residential buildings	2	1	1	1	1	0	1	1	**1.0**
T1.3 ZEB thresholds / nZEB conversion	2	2	1	1	0	1	1	1	**1.1**
T1.4 Fossil-fuel phase-out and heat decarbonisation	2	2	1	2	2	2	1	1	**1.6**
T1.5 TBS and BACS requirements	2	1	0	1	0	1	1	0	**0.8**
T1.6 Performance of glazed areas	1	1	0	2	1	0	1	0	**0.8**
T2.1 One-stop shops	2	2	1	2	2	3	2	1	**1.9**
T2.2 Workforce	2	2	1	2	1	1	1	1	**1.4**
T2.3 Area-based / integrated approach	2	1	0	1	1	1	3	0	**1.1**
T2.4 Mobilisation of public buildings	3	2	2	2	0	3	2	3	**2.1**
T3.1 Financing of investments and needs	2	2	3	2	2	3	3	2	**2.4**
T3.2 Diversified and scalable financing	3	2	2	2	2	3	1	2	**2.1**
T3.3 Mobilisation of multiple benefits	2	1	1	2	2	0	3	1	**1.5**
T4.1 Proactive targeting of vulnerable households	3	2	2	2	3	2	3	2	**2.4**
T4.2 Affordability and activation of the rental market	2	2	1	2	2	1	2	1	**1.6**
T4.3 Social safeguards	3	2	2	2	3	2	3	2	**2.4**
T5.1 Life-cycle climate and environmental impacts	2	1	2	2	0	1	1	1	**1.3**
T5.2 Climate resilience	2	1	0	1	1	1	2	0	**1.0**

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.2	**What the plan contains.** Residential trajectory by building type: 2.06% a year for single-family and 2.58% for multi-dwelling buildings in 2020-2030 (observed 2019-2023: 2.06% and 2.94%), about 2% a year for all buildings to 2050; greenhouse gas emissions −90% and renewable share above 78% in housing by 2050. No average primary-energy milestone per m². Public buildings: 3% a year (EED Article 6), 2.0% achieved in 2024; target rising to 3.93% in 2031-2040 and 4.88% in 2041-2050. MEPS at methodology stage (ISO 52003 two-point method), no kWh/m² thresholds; worst performers mapped (median about 142.5 kWh/m²·yr). ZEB thresholds pending. The plan states no window requirement, although the building code (PURES 2022) sets Uw ≤ 1.0 W/m²K.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Set average primary-energy milestones per m² and the worst-43% rule, and fix MEPS thresholds in kWh/m². **Delivery:** Close the gap on public buildings: 2.0% renovated in 2024 against 3% a year (31% of the cumulative 2014-2024 target).
S2 **Delivery architecture & implementation capacity** Score 1.6	**What the plan contains.** Advice and one-stop shops: the ENSVET citizen advisory network, a project office for public buildings (PP-EPS) and a new office for residential buildings (PP-EPSS, not yet operational), with project-development assistance from the European Investment Bank (ELENA); a national one-stop-shop network is planned with a defined service set and governance, without a throughput target. Public buildings: full inventory of buildings above 250 m². Area-based renovation is a principle, not yet a programme. Workforce: needs named by trade (installers of advanced heating, deep-renovation designers, energy advisers, smart-building experts), no headcount.
	Flagship features. Integrated renovation logic: energy performance, seismic safety, indoor quality and social aspects treated together; about 83% of public-building floor area is in seismic risk classes D to G.
	Priority improvements. *Not a priority at this stage.*
S3 **Finance & political attractiveness** Score 2.0	**What the plan contains.** Investment needs by sector and period for 2026-2050, with mobilised investment, subsidies, private funds and deficits: residential €2,565m needed in 2026-2030 against €1,943m identified (gap €622m); private services gap about €505m (2026-2030); public buildings gap about €451m (2028-2030). Grants of €357m are expected to mobilise €1,585m of private funding (2026-2030). Sources are named only up to the end of the Recovery and Resilience Plan (2026). Instruments: SID Bank holding fund (€280m), Eco Fund loans at 0.7%, ELENA (technical assistance, not investment), an EIB guarantee scheme and green loans being set up.
	Flagship features. Investment deficits stated by sector: residential €622m, private services €505m, public buildings €451m.
	Priority improvements. **For the final plan:** Name the sources that replace the Recovery and Resilience Plan after 2026 and cover the stated deficits.
S4 **Social robustness** Score 2.1	**What the plan contains.** Energy poverty: Social Climate Plan line for 2026-2032 (about €240m, 8,710 projects subsidised at 100%), prevalence indicators and a 2030 target, delivered by coordinators and social workers; public-housing renovation for vulnerable tenants at 85% subsidy. Rental market: split incentive identified (measure M19.10, status "preparation"), limited to exploring solutions; no tenure statistics.
	Flagship features. Energy-poverty line of the Social Climate Plan: about €240m for 8,710 fully subsidised projects (2026-2032), with named delivery actors.
	Priority improvements. **For the final plan:** Design an instrument for the private rental market. **For the final plan:** Set 2040 and 2050 energy-poverty targets.
S5 **Long-term quality & future-proofing** Score 1.1	**What the plan contains.** Whole-life carbon addressed with construction waste, circular economy and digital building logbooks; green public procurement requires 30% wood; no GWP limit values. Climate resilience is a principle of the integrated approach (seismic and climate resilience, cooling needs in three climate zones), with no quantified target or dedicated instrument.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Set a quantified climate-resilience target for buildings.

Quantitative market snapshot

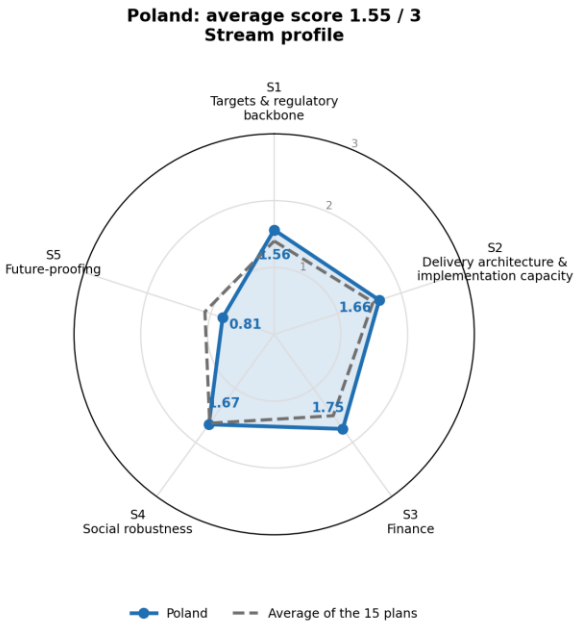
Indicator	Up to 2030	After 2030
Residential renovation rate	Targets 2020-2030: single-family 2.06%, multi-dwelling 2.58% a year; observed 2019-2023: 2.06% and 2.94%	All buildings: 1.97% a year in 2031-2040, 1.99% in 2041-2050
Non-residential renovation	Targets 2020-2030: public buildings 3.05%, other services 1.52% a year; public buildings 2.0% achieved in 2024	Public 3.93% (2031-2040) and 4.88% (2041-2050); other services 2.21%, then 2.31%
Residential investment need	About €507m a year (2026) rising to €523m (2030); gap about €622m over 2026-2030	€2,049m (2031-2035), €1,963m (2036-2040), €1,770m (2041-2045), €1,801m (2046-2050)
Non-residential investment need	Public buildings about €108m to €111m a year; private services about €190m to €195m a year; gaps about €451m (public, 2028-2030) and €505m (private services, 2026-2030)	Public €600m, €668m, €744m, €831m; private services €1,030m, €1,129m, €1,231m, €1,296m (five-year periods 2031-2050)
Public finance	Grants of €357m over 2026-2030 (cohesion policy 2021-2027, Recovery and Resilience Plan to end-2026, Climate Fund, energy-efficiency contribution); Social Climate Plan about €240m	Not stated in the plan (sources named only to end-2026)
Private finance	€1,585m expected over 2026-2030, not split by building type; private-services gap about €505m	Not stated in the plan
One-stop shops	National network planned with defined services and governance; regional energy-poverty advisory points; no throughput target. Costs: about €585,000 training, €671,000 information, €9m energy-community support	Not stated in the plan
Workforce need	No headcount; needs named by trade	Not stated in the plan
Heating systems	Renewable share in housing 60% (2023) to 67% (2030); services 33% to 50%	Housing 78%, services 76% by 2050

Sources: Slovenian draft NBRP; figures as stated in the plan.

Poland

Document assessed: the pre-consultation draft (December 2024) published by the Ministry of Development and Technology, read through an automated English translation. It is not a draft submitted to the Commission and, according to the Polish partners, has been substantially amended since. By October 2026 Poland had not submitted its draft NBRP, and the Commission sent it a reasoned opinion on 1 October 2026.

The Polish NBRP sets two backcast scenarios per building type to 2050 and costs them in per-period tables split between public and private outlay. The instruments described are those of 2021-2023, led by the Clean Air programme (Czyste Powietrze). The scenarios are not committed, the plan does not identify which instruments will fund the public share, the one-stop-shop network is not yet established, and whole-life carbon and resilience lack quantified targets.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	**Topic score**
T1.1 National trajectory for residential buildings	3	2	3	1	1	2	1	3	**2.0**
T1.2 MEPS for non-residential buildings	2	2	2	1	0	2	1	2	**1.5**
T1.3 ZEB thresholds / nZEB conversion	2	2	2	2	0	1	1	2	**1.5**
T1.4 Fossil-fuel phase-out and heat decarbonisation	2	3	2	2	2	2	1	2	**2.0**
T1.5 TBS and BACS requirements	2	1	1	1	0	1	1	1	**1.0**
T1.6 Performance of glazed areas	2	2	1	2	1	1	1	1	**1.4**
T2.1 One-stop shops	2	1	2	2	2	1	2	1	**1.6**
T2.2 Workforce	3	2	2	2	1	1	1	2	**1.8**
T2.3 Area-based / integrated approach	2	2	1	1	2	2	1	1	**1.5**
T2.4 Mobilisation of public buildings	3	2	2	2	0	2	1	2	**1.8**
T3.1 Financing of investments and needs	2	2	3	2	1	2	2	2	**2.0**
T3.2 Diversified and scalable financing	2	3	2	2	2	2	1	2	**2.0**
T3.3 Mobilisation of multiple benefits	2	1	1	0	2	0	2	2	**1.3**
T4.1 Proactive targeting of vulnerable households	2	3	2	2	2	2	2	2	**2.1**
T4.2 Affordability and activation of the rental market	1	2	1	2	2	1	1	1	**1.4**
T4.3 Social safeguards	2	2	1	2	2	1	1	1	**1.5**
T5.1 Life-cycle climate and environmental impacts	2	1	1	0	0	1	1	1	**0.9**
T5.2 Climate resilience	2	1	0	1	1	0	1	0	**0.8**

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.6	**What the plan contains.** Two non-committed backcast scenarios (ambitious and operational) per building type to 2050, with worst-16% and worst-43% subsets: about 163,000 single-family and 7,500 multi-family buildings a year in 2020-2030 (operational scenario). The ambitious path for housing would save 568 ktoe of final energy by 2030, 7% of Poland's economy-wide EED energy-efficiency target (8,600 ktoe). Non-residential MEPS mapped to energy classes (worst 16% = class G, worst 26% = class F), with deadlines of 2033 or 2035 depending on the scenario; no enforcement mechanism. nZEB thresholds in force (Regulation Dz.U. 2022/1225). Heating: individual gas and coal heat sources eliminated by 2040 in the scenarios; over 60% of single-family dwellings are heated only by solid fuels. BACS and windows rest on EPBD transposition and component U-values.
	Flagship features. Two backcast scenarios per building type to 2050, with renovation numbers, floor area, energy, renewable share and CO_2, and worst-16% and worst-43% subsets.
	Priority improvements. **For the final plan:** Commit to one delivery pathway rather than two non-committed scenarios.
S2 **Delivery architecture & implementation capacity** Score 1.7	**What the plan contains.** One-stop shops: the EPBD Article 18 network is not yet established; siting criteria are defined but no number of offices; an interim Energy Consulting Project with 16 partners has delivered 88,878 consultations. Workforce (updated Build Up Skills strategy, BUPS): 380,138 workers needed annually by 2050 (343,278 manual workers, 30,364 specialists, 6,496 advisers) against 114,041 employed today, a gap of 266,097 a year. Public-utility buildings (a Polish legal category covering offices and services): worst 26% by 2033 or 2035, at 2.3-3% a year. Area-based renovation is emerging.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Set the number of one-stop shops, staff and budget against the stated siting criteria. **For the final plan:** Attach training targets and instruments to the stated workforce gap.
S3 **Finance & political attractiveness** Score 1.8	**What the plan contains.** Investment need of about PLN 1.8 trillion (ambitious scenario) to 2.0 trillion (operational) to 2050, about 60% for single-family houses, split by period into public subsidy and private outlay (Tables 71-76); no consolidated total and no identification of the instruments that will provide the public share. The toolbox described is that of 2021-2023: Clean Air (Czyste Powietrze, 487,576 contracts), Warm Apartment, Stop Smog, EU funds, white certificates, thermo-modernisation tax relief (1.5 million taxpayers, PLN 27bn). Multiple benefits: energy and CO_2 savings quantified, air quality and health described qualitatively.
	Flagship features. Clean Air programme (Czyste Powietrze): heat-source and insulation programme at mass scale, 487,576 contracts in 2021-2023 (396,614 heat sources replaced), income-tiered for energy-poor households.
	Priority improvements. **For the final plan:** Identify which instruments fund the public share of the investment need, by period.
S4 **Social robustness** Score 1.7	**What the plan contains.** Vulnerable households: income-tiered aid under Clean Air, Warm Apartment and Stop Smog; worst-16% and worst-43% segments prioritised; informal energy-poverty targets. Rental market: Warm Apartment for low-income multi-family housing, at smaller scale. Safeguards: compensatory premiums of the thermo-modernisation fund. Social and municipal housing are referenced without a link to an affordable-housing plan.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Link social and municipal housing renovation to an affordable-housing plan.
S5 **Long-term quality & future-proofing** Score 0.8	**What the plan contains.** Whole-life carbon discussed with circular-economy and modular measures; sample GWP values only, no statutory obligation. Climate resilience: dedicated section anchored in the national adaptation plan (SPA2020), without quantified targets for buildings.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Set quantified climate-resilience targets for the building stock.

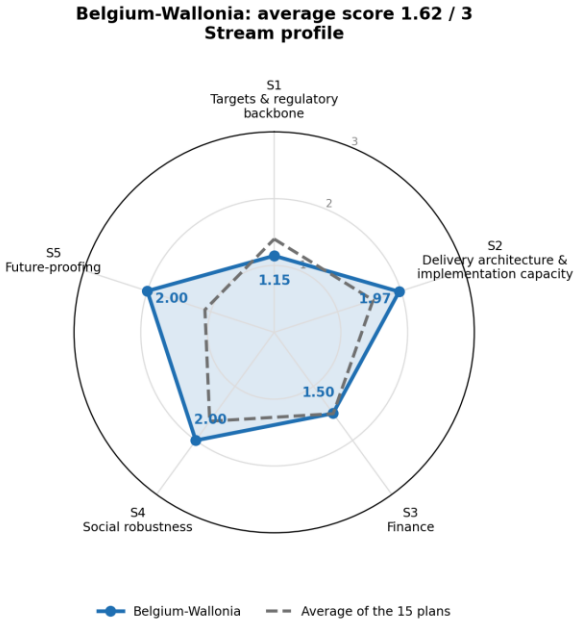
Quantitative market snapshot

Indicator	Up to 2030	After 2030
Residential renovation rate	Operational scenario 2020-2030: about 163,000 single-family and 7,500 multi-family buildings a year (non-committed)	Ambitious scenario: about 163,000 single-family buildings a year on average over 2025-2050 (non-committed)
Non-residential renovation	Public-utility buildings: 2.3-3% a year	Worst 26% renovated by 2033 or 2035
Residential investment need	No consolidated total	Ambitious scenario, by period: single-family PLN 143bn, 516bn, 423bn (private 86, 310, 254; public 57, 206, 169); multi-family PLN 49bn, 170bn, 203bn (private 35, 119, 142; public 15, 51, 61)
Non-residential investment need	Not stated in the plan	Not stated in the plan
Public finance	2021-2023: Clean Air (487,576 contracts), Warm Apartment, Stop Smog; tax relief PLN 27bn (1.5 million taxpayers)	Public share by scenario and period (Tables 71-76); funding instruments not identified
Private finance	No amount stated	Private outlay by scenario and period (Tables 71-76)
One-stop shops	Article 18 network not yet established; advisory points recommended, goal and budget not specified; interim project: 88,878 consultations, 16 partners	Not stated in the plan
Workforce need	114,041 workers employed today	380,138 workers needed a year by 2050 (343,278 manual, 30,364 specialists, 6,496 advisers); gap of 266,097 a year
Heating systems	Over 60% of single-family dwellings heated only by solid fuels	Individual gas and coal heat sources eliminated by 2040 (scenario assumption); district-heating mix by 2050: coal 69% to 0%, heat pumps 0% to 63.8%
Building stock	15.2 million buildings, 2.53 billion m²	Not applicable

Sources: Polish pre-consultation draft NBRP (December 2024); figures as stated in the plan.

Belgium-Wallonia

The Walloon NBRP is built around delivery: a three-level one-stop-shop service up to delegated project management, collective renovation of condominiums and neighbourhood "renovation trains", outreach to vulnerable households, and a cap on rent plus energy cost. Non-residential MEPS thresholds, a window requirement and a BACS measure are missing, measure budgets are given as symbolic tiers rather than amounts, and the Annex II investment table is empty.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	Topic score
T1.1 National trajectory for residential buildings	3	2	3	2	2	2	2	2	2.3
T1.2 MEPS for non-residential buildings	2	1	2	1	0	1	1	1	1.1
T1.3 ZEB thresholds / nZEB conversion	1	2	0	1	0	1	1	0	0.8
T1.4 Fossil-fuel phase-out and heat decarbonisation	2	2	1	1	1	2	3	1	1.6
T1.5 TBS and BACS requirements	1	1	1	1	1	1	2	1	1.1
T1.6 Performance of glazed areas	0	0	0	0	0	0	0	0	0.0
T2.1 One-stop shops	3	2	2	2	2	2	3	2	2.3
T2.2 Workforce	2	2	2	2	1	2	1	2	1.8
T2.3 Area-based / integrated approach	2	2	2	2	2	2	3	1	2.0
T2.4 Mobilisation of public buildings	2	2	2	2	2	2	1	2	1.9
T3.1 Financing of investments and needs	2	2	3	1	2	2	2	1	1.9
T3.2 Diversified and scalable financing	2	1	2	1	2	2	2	1	1.6
T3.3 Mobilisation of multiple benefits	2	1	1	0	2	0	1	1	1.0
T4.1 Proactive targeting of vulnerable households	3	2	2	2	3	2	3	2	2.4
T4.2 Affordability and activation of the rental market	2	1	2	2	3	2	3	2	2.1
T4.3 Social safeguards	2	2	1	1	2	1	2	1	1.5
T5.1 Life-cycle climate and environmental impacts	3	2	2	2	1	2	3	2	2.1
T5.2 Climate resilience	3	2	2	2	0	2	2	2	1.9

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.1	**What the plan contains.** Residential trajectory by energy-label endpoints (2036, 2041, 2050; Measure 8): 3.00% a year in 2024-2030, about 5% a year after 2030. Non-residential: 3.78% a year in 2024-2030 and 7.35% in 2031-2040; MEPS at design stage, without kWh/m² thresholds. ZEB methodology referenced, not operationalised. Fossil boilers phased out by 2040. No dedicated measure on BACS or technical systems (only indirectly, in Measure 9 on rebound effects) and no window performance requirement.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Define kWh/m² MEPS thresholds for non-residential buildings, aligned with the 16% and 26% milestones. **For the final plan:** Add a measure signalling market opportunities for innovative products (insulation materials, smart devices, glazing) to the sector.
S2 **Delivery architecture & implementation capacity** Score 2.0	**What the plan contains.** One-stop shops (Measure 17): three service levels (information, personalised support, delegated project management), building on the existing Guichets Énergie and facilitators; at least one office per 80,000 inhabitants and under 90 minutes' travel by 2026; no office count or cost envelope. Area-based: local heating and cooling plans for all municipalities above 45,000 inhabitants (Measure 10); condominiums (Measure 14: energy certificate for all condominiums by 2030, 10,000 renovated by 2035, 100 certified property managers by 2028); renovation trains (Measure 16: 2,000 dwellings in 2026-2030, at least 10 trains by 2029). Workforce: 64,000 jobs needed in Wallonia for energy renovation (2023 study); training coordinated by the sector alliance (ACER).
	Flagship features. Three-level one-stop-shop service, up to delegated project management for complex cases (Measure 17). Collective renovation: condominium certificates and multi-year roadmaps (10,000 condominiums renovated by 2035) and neighbourhood renovation trains (at least 10 by 2029).
	Priority improvements. *Not a priority at this stage.*
S3 **Finance & political attractiveness** Score 1.5	**What the plan contains.** Works investment of €175bn to 2050 for all buildings (€33bn in 2025-2030, €93bn in 2030-2040, €48bn in 2040-2050), excluding administrative and staff costs; residential €15.93bn cumulative to 2030; non-residential €38-64bn over 2020-2050 (€600-1,000/m²), of which €19-31bn public. No public and private split; measure budgets given as symbolic tiers (€/€€/€€€); Annex II table empty. Toolbox: zero-interest loan combined with grants repositioned as a social safety net; one third of households cannot finance works. Multiple benefits: an energy-cost increase of about 30% is quantified, not used as a funding criterion.
	Flagship features. Zero-interest loan combined with grants repositioned as a social safety net.
	Priority improvements. **For the final plan:** Split the €175bn by public and private contribution and by five-year period, and give amounts for measure budgets. **For the final plan:** Use multiple benefits (energy-cost savings, health, jobs) as a criterion to allocate funding.
S4 **Social robustness** Score 2.0	**What the plan contains.** Vulnerable households (Measure 15): vulnerability maps feeding local outreach strategies (2027-2029), a trusted referent or social-technical pair managing the whole project for the most vulnerable (2028-2032), referral by general practitioners to the one-stop shop. Rental market: "warm rent" (loyer chaud) cap on rent plus energy cost: rent above the limit is not payable where energy performance is below the threshold (Measure 22). Public housing: 25,000 dwellings renovated by 2030.
	Flagship features. Outreach to vulnerable households: vulnerability maps, local outreach and a single referent managing the project (Measure 15). "Warm rent" cap on rent plus energy cost, which limits rent increases after renovation (Measure 22).
	Priority improvements. *Not a priority at this stage.*
S5 **Long-term quality & future-proofing** Score 2.0	**What the plan contains.** Climate resilience (Measure 23): adaptation component in 100% of audits from 2030 and resilience criteria in the energy performance certificate tool by 2030. Life-cycle carbon: TOTEM tool in operation; regional GWP roadmap (Measure 24, Action 5: observatory in 2029, first report in 2030); life-cycle assessment required for new buildings from 2028, at design stage for renovation.
	Flagship features. Climate resilience in every audit from 2030 (Measure 23).
	Priority improvements. *Not a priority at this stage.*

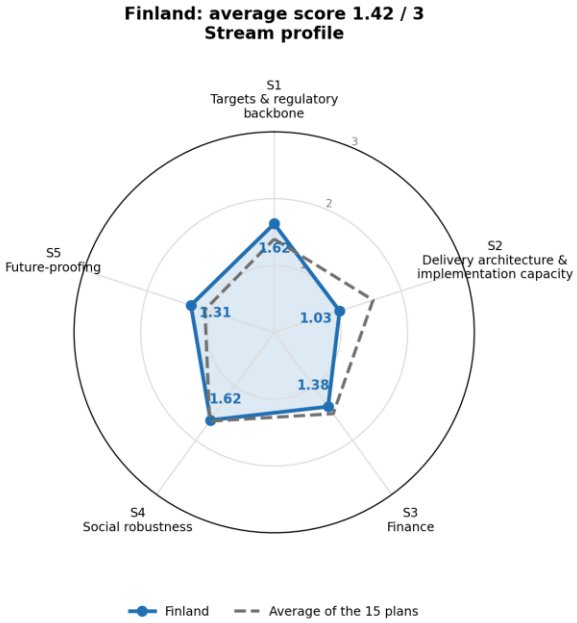
Quantitative market snapshot

Indicator	Up to 2030	After 2030
Residential renovation rate	3.00% a year in 2024-2030 (50,984 buildings a year)	5.06% (2031-2035), 5.10% (2036-2040), 5.06% (2041-2045), 5.22% (2046-2050)
Non-residential renovation	3.78% a year in 2024-2030 (10,869 buildings, 2.41 million m² a year)	7.35% a year in 2031-2040 (21,516 buildings, 4.69 million m² a year)
Residential investment need	€15.93bn cumulative from 2020 to 2030 (apartments €1.10bn, houses €14.83bn); works only	€62.23bn cumulative to 2040, €110.66bn to 2050
Non-residential investment need	€38-64bn over 2020-2050 at €600-1,000/m², of which €19-31bn public buildings; not split by period	Included in the 2020-2050 figure
All-buildings investment need	€33bn in 2025-2030 (about €6bn a year), works only	€93bn in 2030-2040, €48bn in 2040-2050; €175bn in total
Public finance	Not stated in the plan (measure budgets as symbolic tiers)	Not stated in the plan
Private finance	Not stated in the plan	Not stated in the plan
One-stop shops	Three service levels on the existing Guichets Énergie; at least one office per 80,000 inhabitants and under 90 minutes by 2026; level 2 by 2028; no office count or cost envelope	Level 3 by 2040
Workforce need	64,000 jobs needed in Wallonia for energy renovation (2023 study)	71,000 additional construction jobs at Belgian level
Heating systems	44% of residential units in classes F or G (2020)	Fossil boilers phased out by 2040

Sources: Walloon draft NBRP; figures as stated in the plan.

Finland

The Finnish NBRP relies on regulation and market dynamics: a long-standing nZEB regime, whole-life carbon regulated under the 2025 Construction Act, about 1.6 million heat pumps and largely decarbonised district heating. The one-stop shop is still "to be developed", there is no workforce chapter or area-based programme, energy poverty is handled through the welfare system rather than renovation targeting, and overheating is not measured.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	**Topic score**
T1.1 National trajectory for residential buildings	3	2	3	2	1	2	1	3	**2.1**
T1.2 MEPS for non-residential buildings	2	1	2	1	1	0	1	2	**1.3**
T1.3 ZEB thresholds / nZEB conversion	2	2	2	2	0	1	1	2	**1.5**
T1.4 Fossil-fuel phase-out and heat decarbonisation	3	3	3	2	1	2	1	3	**2.3**
T1.5 TBS and BACS requirements	3	2	1	2	0	1	1	1	**1.4**
T1.6 Performance of glazed areas	2	2	1	2	0	1	1	1	**1.3**
T2.1 One-stop shops	2	2	0	2	1	2	1	0	**1.3**
T2.2 Workforce	1	2	0	1	1	1	1	0	**0.9**
T2.3 Area-based / integrated approach	1	1	0	1	0	1	1	0	**0.6**
T2.4 Mobilisation of public buildings	2	2	0	2	0	2	1	2	**1.4**
T3.1 Financing of investments and needs	2	2	2	2	1	2	2	1	**1.8**
T3.2 Diversified and scalable financing	2	2	2	2	1	2	1	1	**1.6**
T3.3 Mobilisation of multiple benefits	1	1	1	0	1	0	1	1	**0.8**
T4.1 Proactive targeting of vulnerable households	2	2	1	2	2	1	1	2	**1.6**
T4.2 Affordability and activation of the rental market	2	2	1	2	2	2	1	1	**1.6**
T4.3 Social safeguards	2	2	1	2	2	1	1	2	**1.6**
T5.1 Life-cycle climate and environmental impacts	3	2	2	3	0	2	3	2	**2.1**
T5.2 Climate resilience	1	1	0	1	0	0	1	0	**0.5**

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.6	**What the plan contains.** Residential roadmap to 2050 expressed in energy, not renovation rates: E-number (primary-energy indicator) −59% and CO_2 −100% by 2050 (−65 ktoeE a year), with five-year milestones, within the 2035 carbon-neutrality target of the Climate Act; the worst 43% of the stock delivers 55% of the effort. nZEB regime in force (Decree 1010/2017, tightened six times since 1978, 38% renewable requirement); ZEB definition not yet set. Non-residential MEPS rely on EPBD transposition (worst 16% by 2030, 26% by 2033), without thresholds. BACS obligation in force (Act 733/2020, above 290 kW), under revision. Heating: about 1.6 million heat pumps, district heat largely decarbonised, oil heating marginal.
	Flagship features. Market-led heat decarbonisation: about 1.6 million heat pumps and largely decarbonised district heat, with oil heating marginal.
	Priority improvements. **For the final plan:** Set non-residential MEPS thresholds.
S2 **Delivery architecture & implementation capacity** Score 1.0	**What the plan contains.** One-stop shop "to be developed" on top of the Motiva advisory service (free and impartial, in all regions since the 1970s) and the Financial Information Service; no throughput target. No workforce chapter or gap diagnosis; training through existing bodies. No area-based renovation programme, only the KIRA low-carbon built-environment programme. Public buildings: the plan relies on the solar-readiness requirement of EPBD Article 10 (staged from 2027) and a voluntary green public procurement guide.
	Flagship features. Nationwide, free and impartial energy advice by Motiva since the 1970s, the base for the planned one-stop shop.
	Priority improvements. **For the final plan:** Build the one-stop shop with coverage and throughput targets. **For the final plan:** Add a workforce chapter with a quantified gap and a training target. **For the final plan:** Introduce an area-based renovation programme.
S3 **Finance & political attractiveness** Score 1.4	**What the plan contains.** Investment need of €33bn for energy efficiency over 2025-2050 (€19.2bn residential, €13.8bn non-residential), about €1.3bn a year, not tied to a delivery pathway. Public sources could cover about €0.5bn a year at the 2020-2024 support level, leaving about €0.8bn to private finance; the split rests on an assumed 8% share of total renovation financing. Instruments: household tax credit, interest-subsidy loans of the Housing Finance and Development Centre (ARA, renamed Varke in 2025), energy grants (about €20m in 2023), oil and gas boiler phase-out subsidy, voluntary energy efficiency agreements; not tiered for vulnerable households. Multiple benefits implied, not quantified.
	Flagship features. Voluntary energy efficiency agreements: 40 rental housing companies and €1.5bn of investment by 2023, without a mandatory instrument.
	Priority improvements. **For the final plan:** Replace the 8% assumption with observed financing data and tie the €1.3bn a year to a costed pathway.
S4 **Social robustness** Score 1.6	**What the plan contains.** Energy poverty is handled in advance through social benefits (housing allowance, basic income) rather than renovation targeting; no energy-poverty reduction target. Rental market: interest-subsidy loans (ARA, now Varke) and voluntary agreements of rental companies; split incentive not resolved. Safeguards rest on the constitution-based welfare system (Kela).
	Flagship features. *None identified.*
	Priority improvements. *Not a priority at this stage.*
S5 **Long-term quality & future-proofing** Score 1.3	**What the plan contains.** Whole-life carbon regulated: Construction Act 2025, climate-report obligation (Act 1027/2024), national CO2data emission database, limit values phased in by decree. Climate resilience: overheating "not actually measured"; only a 2024 guide on climate-resilient urban planning, no building instrument.
	Flagship features. Whole-life-carbon regulation (Construction Act 2025), with a climate-report obligation, the CO2data database and limit values phased in by decree.
	Priority improvements. **For the final plan:** Develop a building-level climate-resilience instrument and measure overheating.

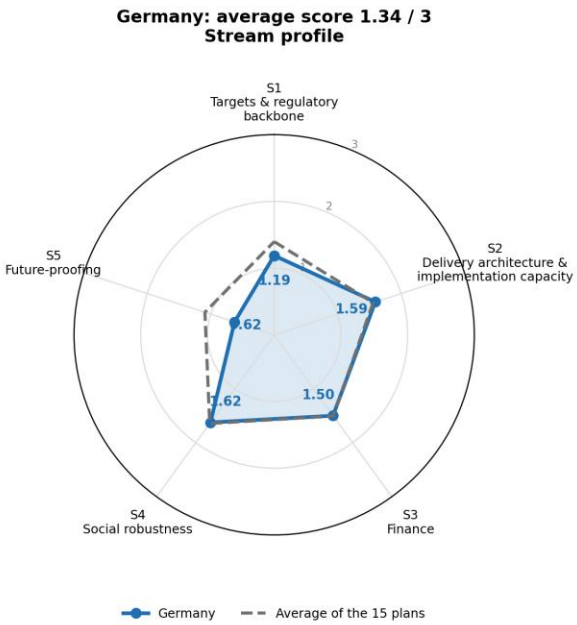
Quantitative market snapshot

Indicator	Up to 2030	After 2030
Residential renovation rate	No rate: residential consumption −70 ktoe a year and E-number −65 ktoeE a year over 2020-2050	−2,091 ktoe and −2,016 ktoeE by 2050; worst 43% of the stock delivers 55% of the effort
Non-residential renovation	No rate: consumption −20 ktoe a year, E-number −25 ktoeE a year. MEPS: worst 16% by 2030	MEPS: worst 26% by 2033; −625 ktoe and −805 ktoeE by 2050
Residential investment need	€19.2bn over 2025-2050; about €1.3bn a year for both segments (energy efficiency only)	Included in the 2025-2050 figure
Non-residential investment need	€13.8bn over 2025-2050	Included in the 2025-2050 figure
Public finance	About €0.5bn a year (national and EU), at the 2020-2024 level	Not stated in the plan
Private finance	About €0.8bn a year (assumed 8% share of renovation financing)	Not stated in the plan
One-stop shops	Motiva: free, impartial advice in all regions; one-stop shop to be developed; staffing not stated	Not stated in the plan
Workforce need	Not quantified in the plan	Not quantified in the plan
Heating systems	About 1.6 million heat pumps; district heat largely decarbonised; wood under 40%	Fossil phase-out; no device-stock trajectory
BACS	Act 733/2020: non-residential above 290 kW; amendments expected May 2026	Not stated in the plan
Building stock	410 million m² (2020), 1.4 million buildings (1.3 million residential)	Not applicable

Sources: Finnish draft NBRP; figures as stated in the plan.

Germany

The German NBRP rests on instruments in force: the 65%-renewables rule of the Building Energy Act (GEG), mandatory municipal heat planning under the Heat Planning Act (Wärmeplanungsgesetz, WPG), the federal funding for efficient buildings (BEG) and the CO_2 Cost Allocation Act. Non-residential MEPS thresholds and ZEB values are deferred to the final report pending national votes, whole-life-carbon limit values are only planned, and climate resilience is almost absent.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	**Topic score**
T1.1 National trajectory for residential buildings	3	2	3	2	1	2	1	2	**2.0**
T1.2 MEPS for non-residential buildings	2	1	1	1	0	1	1	1	**1.0**
T1.3 ZEB thresholds / nZEB conversion	1	1	0	0	0	1	1	0	**0.5**
T1.4 Fossil-fuel phase-out and heat decarbonisation	2	2	2	2	2	2	2	2	**2.0**
T1.5 TBS and BACS requirements	1	1	0	1	0	1	1	0	**0.6**
T1.6 Performance of glazed areas	1	2	1	2	0	1	1	0	**1.0**
T2.1 One-stop shops	2	2	1	2	2	1	2	1	**1.6**
T2.2 Workforce	2	2	1	1	1	1	2	1	**1.4**
T2.3 Area-based / integrated approach	2	2	1	2	1	2	2	2	**1.8**
T2.4 Mobilisation of public buildings	2	2	2	2	1	1	1	2	**1.6**
T3.1 Financing of investments and needs	2	2	3	2	1	2	2	2	**2.0**
T3.2 Diversified and scalable financing	2	3	1	2	2	2	1	1	**1.8**
T3.3 Mobilisation of multiple benefits	2	1	0	0	2	0	1	0	**0.8**
T4.1 Proactive targeting of vulnerable households	2	3	1	2	2	2	2	1	**1.9**
T4.2 Affordability and activation of the rental market	2	2	1	2	2	2	2	1	**1.8**
T4.3 Social safeguards	2	2	0	2	2	1	1	0	**1.3**
T5.1 Life-cycle climate and environmental impacts	2	2	0	1	0	1	2	0	**1.0**
T5.2 Climate resilience	1	0	0	0	0	0	1	0	**0.3**

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.2	**What the plan contains.** Residential trajectory with milestones in kWh/m²·yr (157 to 93 over 2030-2045) and renovation volumes (200,359 to 323,569 a year), without annual renovation-rate targets; the current rate is estimated, not officially collected. Non-residential MEPS: method set (16% and 26% percentiles, reference-building factor), thresholds left to the final report. ZEB defined as certificate class A; Article 11 values pending national votes. Public buildings: 3% a year (EED Article 6). Heating: every newly installed heating system must use at least 65% renewable energy (GEG, 2024), boiler-replacement obligation (§72), renewable-heating milestones 65%, 88% and 100%. BACS: the smart-technology section covers electric mobility, not building automation.
	Flagship features. Renewable-heating rule: every newly installed heating system must run on at least 65% renewable energy (GEG, in force 2024), with a fossil-boiler phase-out in 2040/2045.
	Priority improvements. **For the final plan:** Publish the non-residential MEPS thresholds and the ZEB values. **For the final plan:** Attach annual renovation-rate targets to the Chapter 8 trajectory. **For the final plan:** Add electricity-grid integration: connection capacity and flexibility of heat pumps.
S2 **Delivery architecture & implementation capacity** Score 1.6	**What the plan contains.** Area-based: mandatory municipal heat planning under the WPG, in force since 1 January 2024; more than half of municipalities complete; deadlines mid-2026 (above 100,000 inhabitants) and mid-2028 (smaller); €500m of federal funds for 2024-2028. Funding for district concepts and renovation management (KfW 432) stopped at the end of 2023 and resumed in November 2025; the KfW 201/202 municipal loans (about €2.18bn since 2012) stopped. Public buildings: federal exemplary-role programme (EDFB, about €1bn a year since 2021). One-stop shops: 38+ regional energy agencies and about 23,000 certified experts, without coordination; the Article 18 network is at design stage. Workforce: expert list and qualification schemes; shortfall not quantified.
	Flagship features. Mandatory municipal heat planning (WPG), with binding deadlines and more than half of municipalities complete.
	Priority improvements. *Not a priority at this stage.*
S3 **Finance & political attractiveness** Score 1.5	**What the plan contains.** Investment need to 2045 with a public and private split: €43.4bn in 2026 rising to €72.8bn in 2030 (residential €34.3bn to €56.5bn, non-residential €9.1bn to €16.3bn), then €162.3bn (2031-2032), €228.1bn (2033-2035), €309.5bn (2036-2040) and €246.2bn (2041-2045). The forward public budget is not stated: it depends on the annual negotiation of the Climate and Transformation Fund (KTF). Instruments: BEG loans and grants (value added about €23.7bn in 2024), tax relief for renovation (§35c), KfW, Renewable Energy Sources Act support (EEG, €16.16bn), income bonus up to 70%. The multiple-benefits and energy-poverty chapter is a placeholder.
	Flagship features. Federal funding for efficient buildings (BEG) with income differentiation: loans, grants, tax relief and a bonus raising support to 70% for households with incomes up to €40,000.
	Priority improvements. **Delivery:** Secure a multi-year budget line instead of the annual negotiation of the KTF. **For the final plan:** Fill the multiple-benefit and energy-poverty indicators.
S4 **Social robustness** Score 1.6	**What the plan contains.** Vulnerable households: income heating bonus (up to 70% support for incomes up to €40,000), energy-saving check reaching about 460,000 households (with Caritas), climate component of the housing allowance; energy-poverty definition under national vote, no baseline or target. Rental market: the plan addresses the split incentive through the modernisation rent increase of § 559 and § 559e of the Civil Code (BGB), capped at 8% of investment costs, and the CO_2 Cost Allocation Act, which splits carbon costs between landlord and tenant according to the building's emissions. Safeguards: minimum income support (Social Code II and XII).
	Flagship features. CO_2 Cost Allocation Act: carbon costs split between landlord and tenant according to the building's emissions.
	Priority improvements. *Not a priority at this stage.*
S5 **Long-term quality & future-proofing** Score 0.6	**What the plan contains.** Whole-life carbon and circular economy addressed (substitute building-materials ordinance, Circular Economy Act); life-cycle GWP limit values planned once the DIN SPEC 91606 method is complete (April 2026). Climate resilience appears only as a co-benefit of urban-rehabilitation programmes; no policy, instrument or target.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Align the DIN SPEC 91606 life-cycle method with EN 15978. **For the final plan:** Develop a dedicated climate-resilience policy.

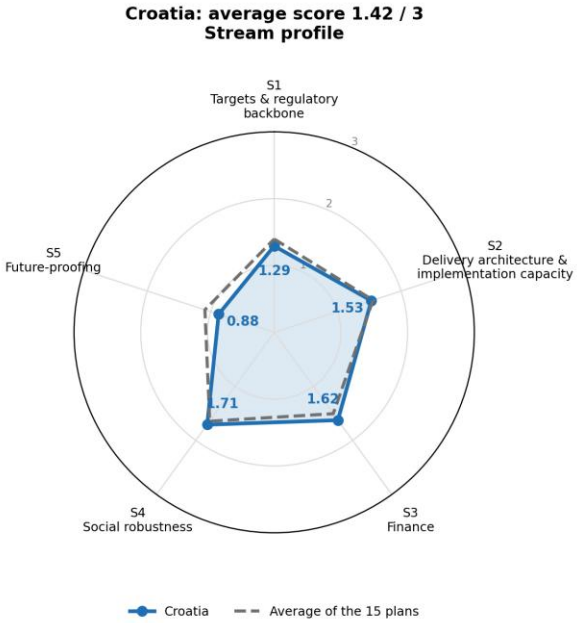
Quantitative market snapshot

Indicator	Up to 2030	After 2030
Residential renovation rate	No rate target; rate estimated from funding data, not officially collected	Trajectory from 200,359 to 323,569 renovations a year; 157 to 93 kWh/m²·yr over 2030-2045
Residential renovation depth	Light and medium renovations reported; average depth not available	Not stated in the plan
Non-residential renovation	Not stated in the plan	Not stated in the plan
Residential investment need	€34.3bn (2026) rising to €56.5bn (2030) a year	All buildings: €162.3bn (2031-2032), €228.1bn (2033-2035), €309.5bn (2036-2040), €246.2bn (2041-2045); 2046-2050 not given
Non-residential investment need	€9.1bn (2026) rising to €16.3bn (2030) a year	Included in the all-building totals
Public finance	Public investment in Table 5-B (BEG, tax subsidies, public buildings); BEG value added about €23.7bn (2024); federal buildings about €1bn a year	Public series to 2045 (Table 5-B)
Private finance	Remainder of Table 5-A	Not tabulated separately
One-stop shops	38+ regional agencies, about 23,000 certified experts; no network, coverage or staffing stated	Not stated in the plan
Workforce need	Not stated in the plan	Not stated in the plan
Heating systems	Every new heating system at least 65% renewable (since 2024)	Renewable-heating milestones of 65%, 88% and 100% to 2045
Area-based	Municipal heat plans due mid-2026 (above 100,000 inhabitants) and mid-2028; more than half complete	KfW 201/202 municipal loans (about €2.18bn since 2012) discontinued end-2023
Vulnerable households	Income heating bonus up to 70% (incomes up to €40,000); energy-saving check for about 460,000 households	No energy-poverty baseline or target

Sources: German draft NBRP; figures as stated in the plan.

Croatia

The Croatian NBRP couples energy renovation with post-earthquake seismic reconstruction and links it to the country's first umbrella housing strategy (National Housing Policy Plan 2030). It sets non-residential MEPS per building type and quantifies energy poverty. The residential trajectory contrasts with an observed renovation rate of 0.41%, the financing-source lines of the investment table are largely blank, the energy-poverty programme is still to be adopted, and whole-life carbon and climate adaptation have no dedicated instrument.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	Topic score
T1.1 National trajectory for residential buildings	3	2	3	1	1	1	1	2	1.8
T1.2 MEPS for non-residential buildings	3	2	3	2	1	2	1	2	2.0
T1.3 ZEB thresholds / nZEB conversion	2	2	2	2	0	1	1	2	1.5
T1.4 Fossil-fuel phase-out and heat decarbonisation	2	1	1	1	1	1	1	1	1.1
T1.5 TBS and BACS requirements	2	1	1	1	0	1	1	0	0.9
T1.6 Performance of glazed areas	1	1	0	1	0	0	1	0	0.5
T2.1 One-stop shops	3	2	1	2	2	2	2	0	1.8
T2.2 Workforce	2	2	2	2	1	1	1	1	1.5
T2.3 Area-based / integrated approach	2	1	0	1	1	1	1	0	0.9
T2.4 Mobilisation of public buildings	3	2	2	2	1	2	2	2	2.0
T3.1 Financing of investments and needs	2	1	3	1	1	1	2	1	1.5
T3.2 Diversified and scalable financing	2	2	1	2	1	2	1	1	1.5
T3.3 Mobilisation of multiple benefits	2	2	1	2	2	2	3	1	1.9
T4.1 Proactive targeting of vulnerable households	2	2	2	1	2	1	2	2	1.8
T4.2 Affordability and activation of the rental market	3	2	2	2	1	2	2	2	2.0
T4.3 Social safeguards	2	1	1	1	2	1	2	1	1.4
T5.1 Life-cycle climate and environmental impacts	1	1	0	1	0	1	1	0	0.6
T5.2 Climate resilience	2	1	0	1	1	1	2	1	1.1

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.3	**What the plan contains.** Residential trajectory: primary energy (Eprim) from 272 to 135 kWh/m²·yr by 2050 (−51%), with a worst-43% sub-target; observed renovation rate 0.41% in 2023. Non-residential MEPS (Table 7-2): Eprim thresholds per building type for the worst 16% by 2030 and 26% by 2033, renovated floor area per period (3.23 million m² by 2033, 15.67 million m² by 2040), and a mandatory energy-service (ESCO) model for large buildings. nZEB in force since 2017/2019 (at least 30% renewables, airtightness); ZEB thresholds from 2030 pending. Windows are handled within the envelope, without a specific requirement.
	Flagship features. MEPS per building type with a mandatory ESCO model: Eprim thresholds for the worst 16% and 26%, renovated floor area per period, energy-service contracts for large buildings.
	Priority improvements. **For the final plan:** Add a mechanism securing the step-up from the observed 0.41% rate to the trajectory. **For the final plan:** Set a window performance requirement.
S2 **Delivery architecture & implementation capacity** Score 1.5	**What the plan contains.** One-stop shop Renovamo.hr: online portal covering energy and earthquake renovation, with information centres in Zagreb, Sisak, Glina and Petrinja (all earthquake-affected); information remit only, coordination sits with supervising engineers, ESCOs and building managers. Public buildings: 30,539 buildings (11.26 million m²), mandatory ESCO model, 0.62% renovated in 2023. Workforce (Build Up Skills Croatia): 24,530 vocational workers and 5,800 engineers needed by 2030. Area-based delivery referenced, not operationalised.
	Flagship features. Seismic-energy renovation coupling since the 2020 earthquakes, through Renovamo.hr and reconstruction funds; 209 of 227 damaged public buildings under renovation under a "Build Back Better" rule.
	Priority improvements. *Not a priority at this stage.*
S3 **Finance & political attractiveness** Score 1.6	**What the plan contains.** Investment needs given through programme budgets (€3.44bn for 2021-2030, €2.5bn, €1.68bn from the Social Climate Fund, €2.03bn for housing), with a worst-43% split; no consolidated total, financing-source rows largely blank and Annex II table empty. Sources named: EU ETS, Social Climate Fund, state budget. Toolbox: grants, an ESCO market of more than 20 companies with savings guarantee, public-private partnerships and energy performance contracts; amounts per instrument not given. Multiple benefits: seismic safety and energy-poverty reduction integrated.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Fill the financing-source rows against the programme budgets, especially for late-period needs.
S4 **Social robustness** Score 1.7	**What the plan contains.** Energy poverty: 12.2% of households (2022), share to fall from 11% to 7%, to be delivered by a Programme to combat energy poverty still to be adopted. Affordable housing: the National Housing Policy Plan 2030 and its Action Plan 2025-2027 (NN 56/25, adopted 26 March 2025) are Croatia's first umbrella housing strategy: 65,000 renovated households and 9,000 affordable rentals by 2030, €2.03bn (€683.6m for 2025-2027). Rental activation is limited, owner occupation dominating.
	Flagship features. National Housing Policy Plan 2030: renovation (65,000 households) and affordability (9,000 affordable rentals) in one strategy, with €2.03bn to 2030.
	Priority improvements. **For the final plan:** Adopt the Programme to combat energy poverty and fix its targets.
S5 **Long-term quality & future-proofing** Score 0.9	**What the plan contains.** Whole-life carbon appears only as an EPBD template item, with the methodology deferred to a future Commission delegated act; the Circular Economy Development Programme 2021-2030 is in force. Climate resilience is coupled with seismic renovation ("Build Back Better"); no instrument for overheating or cooling, no adaptation target.
	Flagship features. *None identified.*
	Priority improvements. *Not a priority at this stage.*

Quantitative market snapshot

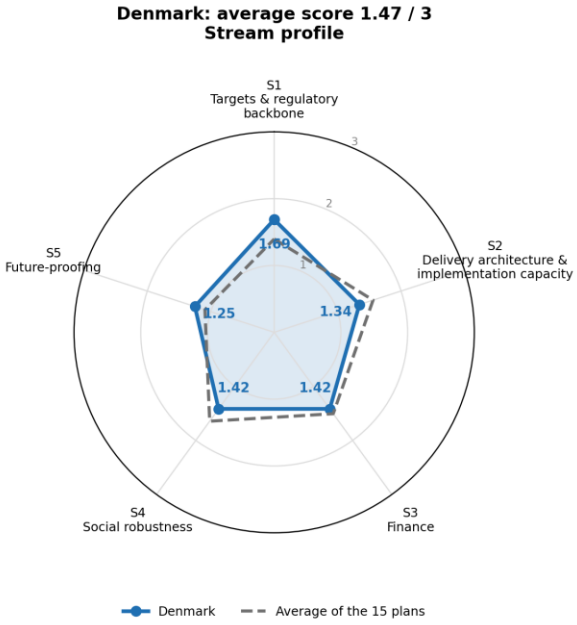
Indicator	Up to 2030	After 2030
Residential renovation rate	Observed 0.41% in 2023 (5,407 buildings, 558,415 m²: 0.40% light, 0.02% medium, 0% deep)	Eprim from 272 to 135 kWh/m²·yr by 2050
Residential renovation depth	Definitions: light 3-30% savings, medium 30-60%, deep above 60%	No depth split
Non-residential renovation	Observed 0.17% in 2023 (20 buildings, 70,333 m², medium depth)	MEPS: 3.23 million m² by 2033, 15.67 million m² by 2040
Residential investment need	No consolidated total: programme budgets €3.44bn (2021-2030), €2.5bn, €1.68bn (Social Climate Fund), €2.03bn (housing)	Not stated in the plan
Non-residential investment need	Included in the programme budgets	Not stated in the plan
Public finance	Regional, local and national funds; EU ETS, Social Climate Fund, state budget; no amounts by source	Not stated in the plan
Private finance	No amount stated	Not stated in the plan
One-stop shops	Renovamo.hr portal and four centres; information remit only	No throughput target
Workforce need	24,530 vocational workers and 5,800 engineers by 2030 (about 2,530 workers a year)	Not stated in the plan
Energy poverty	12.2% of households (2022); share to fall from 11% to 7%	Programme to combat energy poverty to be adopted
Affordable housing	€683.6m for 2025-2027; by 2030: 65,000 renovated households, 9,000 affordable rentals, €2.03bn	Not stated in the plan
Building stock	Energy certificates cover 6.07% of the stock; 37.32% of residential stock worst-performing	Not applicable

Sources: Croatian draft NBRP; figures as stated in the plan.

Denmark

Reading note: the Danish NBRP is deliberately concise and relies on cross-references to existing legislation (Building Code BR18, Erhvervspuljen, Sparenergi.dk, Landsbyggefonden, Green Housing Agreement). The scores reflect what the NBRP contains; where it cross-references mature frameworks, some dimension scores were adjusted upward. Where it is silent (climate resilience, rental-market instruments), the gap is real.

The Danish NBRP builds on the Building Code BR18, which already sets ZEB thresholds and binding whole-life-carbon limits, on a national digital one-stop shop (Sparenergi.dk) and on an investment envelope for 2026-2030 split between public and private sources. Renovation-rate targets are deferred to the final plan, non-residential MEPS use a single threshold for all building types, the financing toolbox relies on grants, and climate resilience is absent.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	Topic score
T1.1 National trajectory for residential buildings	3	2	3	2	1	2	1	3	2.1
T1.2 MEPS for non-residential buildings	3	2	3	2	1	2	2	2	2.1
T1.3 ZEB thresholds / nZEB conversion	3	2	2	2	0	1	1	3	1.8
T1.4 Fossil-fuel phase-out and heat decarbonisation	3	3	3	3	1	2	3	3	2.6
T1.5 TBS and BACS requirements	3	2	1	2	0	2	1	1	1.5
T1.6 Performance of glazed areas	0	0	0	0	0	0	0	0	0.0
T2.1 One-stop shops	2	2	0	2	1	2	2	1	1.5
T2.2 Workforce	2	2	0	1	2	1	1	1	1.3
T2.3 Area-based / integrated approach	1	1	0	1	1	1	1	1	0.9
T2.4 Mobilisation of public buildings	3	2	2	2	0	1	1	3	1.8
T3.1 Financing of investments and needs	2	2	3	2	1	2	1	2	1.9
T3.2 Diversified and scalable financing	2	2	2	2	1	2	2	1	1.8
T3.3 Mobilisation of multiple benefits	1	1	1	0	1	0	1	0	0.6
T4.1 Proactive targeting of vulnerable households	2	1	0	2	2	2	1	1	1.4
T4.2 Affordability and activation of the rental market	1	2	2	2	2	2	2	1	1.8
T4.3 Social safeguards	2	1	0	2	2	1	1	0	1.1
T5.1 Life-cycle climate and environmental impacts	3	3	3	3	1	2	3	2	2.5
T5.2 Climate resilience	0	0	0	0	0	0	0	0	0.0

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.7	**What the plan contains.** Renovation-rate targets deferred: an external analysis of the current rate was due in February 2026, with targets to be included in the final plan by 31 December 2026. ZEB thresholds already in the Building Code BR18 (Table 31: below 27 kWh/m²·yr residential, below 33 non-residential), mandatory from 2028 (public) and 2030 (all). Non-residential MEPS: one set of thresholds for all building types, uses being differentiated through supplements in the energy-certificate calculation: 190 kWh/m²·yr (worst 16%, by 2030) and 168 (worst 26%, by 2033); 139 (2040) and 97 (2050) indicative. Public buildings: 3% a year (EED Article 6). Heating: oil and gas boilers from about 330,000 (2023) to 215,000 (2030) and 36,000 (2040), backed by a CO_2 tax path. BACS addressed in fragments (Article 23(6) alternative measures, automation requirements above 290 kW, commissioning); windows minimally addressed.
	Flagship features. Business grant scheme (Erhvervspuljen) funding building automation for systems above 290 kW (controls, monitoring, fault detection for cooling and ventilation).
	Priority improvements. For the final plan: Show that the supplements in the certificate calculation give comparable ambition across building uses.
S2 **Delivery architecture & implementation capacity** Score 1.3	**What the plan contains.** One-stop shop: Sparenergi.dk, national and digital (segmented digital mail to homeowners, public meetings in five regions by the Danish Energy Agency, the Energi- og Bygningsanalysen tool free for all municipalities); recommendations are not tailored to the building or household; no coverage or staffing stated. Area-based approaches fragmented (voluntary climate alliance, hospital sector). Public buildings: 3.9 million m² covered by an agreement under the EED, energy class B targeted by 2040. Workforce not stated.
	Flagship features. National digital one-stop shop (Sparenergi.dk) with segmented outreach and a free analysis tool for all municipalities.
	Priority improvements. Delivery: Make Sparenergi.dk recommendations specific to the building and the household.
S3 **Finance & political attractiveness** Score 1.4	**What the plan contains.** Investment need of €2,353m for 2026-2030 (€1,889m residential, of which €1,330m for the worst 43%; €464m non-residential), financed by €1,388m public (local €940m, regional €52m, national €396m, no EU funds) and €966m private, not disaggregated; €9,446m residential and €3,334m non-residential cumulative over 2026-2050. Toolbox based on grants and schemes; no property-linked or on-bill repayment, no energy-savings-certificate market. Multiple benefits at study stage.
	Flagship features. *None identified.*
	Priority improvements. For the final plan: Add financing instruments beyond grants (property-linked or on-bill repayment, efficient mortgages).
S4 **Social robustness** Score 1.4	**What the plan contains.** Vulnerable households reached through the National Building Fund (Landsbyggefonden) for non-profit housing, with the Green Housing Agreement (€3.6bn). Rental market: split incentive acknowledged (the "paradox problem", 2014 attempt documented), no new instrument. Social safeguards weak in the plan.
	Flagship features. National Building Fund (Landsbyggefonden) and Green Housing Agreement (€3.6bn) as the financing vehicle for non-profit housing renovation.
	Priority improvements. For the final plan: Present the link with social and affordable housing (Landsbyggefonden) as housing policy, not only as a financing route.
S5 **Long-term quality & future-proofing** Score 1.3	**What the plan contains.** Whole-life carbon: binding limit values under BR18 since 2023, differentiated by building type, including transport and construction-site modules (A4, A5), tightened to 2029. Climate resilience absent from the plan.
	Flagship features. Binding whole-life-carbon limits in the Building Code BR18 since 2023, differentiated by building type and tightened to 2029.
	Priority improvements. For the final plan: Add a climate-resilience section: risk mapping, overheating and flooding criteria in renovation packages.

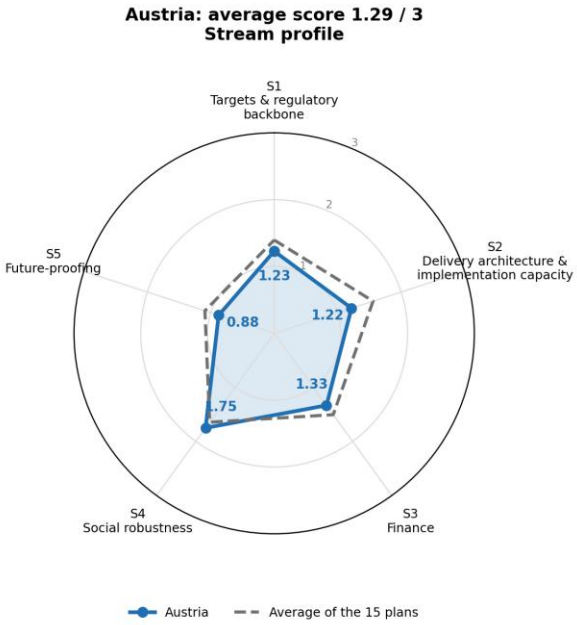
Quantitative market snapshot

Indicator	Up to 2030	After 2030
Residential renovation rate	Not set: analysis of the current rate due February 2026; targets in the final plan by 31 December 2026	Not stated in the plan
Non-residential renovation	Not set (same timeline); renovation to follow MEPS: 190 kWh/m²·yr by 2030 (worst 16%)	MEPS: 168 kWh/m²·yr by 2033 (worst 26%); 139 in 2040 and 97 in 2050, indicative
Residential investment need	€1,889m over 2026-2030 (worst 43%: €1,330m)	€9,446m over 2026-2050 (cumulative, incl. 2026-2030)
Non-residential investment need	€464m over 2026-2030	€3,334m over 2026-2050 (cumulative, incl. 2026-2030)
Public finance	€1,388m over 2026-2030, all buildings: local €940m, regional €52m, national €396m, EU nil	Same public share in later periods; no EU funds
Private finance	€966m over 2026-2030, all buildings; not disaggregated	Not stated in the plan
One-stop shops	Sparenergi.dk digital one-stop shop; no coverage or staffing stated	Not stated in the plan
Workforce need	Not stated in the plan	Not stated in the plan
Heating systems	Oil and gas boilers from about 330,000 (2023) to 215,000 (2030)	About 36,000 in 2040

Sources: Danish NBRP; figures as stated in the plan.

Austria

The Austrian NBRP reflects a federal structure: standards, delivery and finance are split across nine Länder, and the plan itself notes a lack of national coordination. It quantifies energy poverty under three definitions and relies on a federal coordination centre (kea), sets a fossil-heating phase-out for 2040, and provides MEPS and ZEB thresholds in OIB Directive 6, not yet transposed into the Länder building ordinances. The finance chapter (December 2025 draft) is marked as not finalised and identifies no source of funds.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	**Topic score**
T1.1 National trajectory for residential buildings	3	2	3	1	1	2	1	2	**1.9**
T1.2 MEPS for non-residential buildings	3	2	2	1	1	1	1	1	**1.5**
T1.3 ZEB thresholds / nZEB conversion	3	2	2	1	0	1	1	1	**1.4**
T1.4 Fossil-fuel phase-out and heat decarbonisation	2	2	1	2	1	2	1	2	**1.6**
T1.5 TBS and BACS requirements	1	2	0	0	0	0	1	0	**0.5**
T1.6 Performance of glazed areas	1	1	0	1	0	0	1	0	**0.5**
T2.1 One-stop shops	2	2	1	2	2	1	1	0	**1.4**
T2.2 Workforce	2	2	1	2	1	1	1	0	**1.3**
T2.3 Area-based / integrated approach	2	1	0	1	1	1	1	0	**0.9**
T2.4 Mobilisation of public buildings	2	2	2	2	0	1	1	1	**1.4**
T3.1 Financing of investments and needs	2	1	2	1	1	2	2	1	**1.5**
T3.2 Diversified and scalable financing	2	2	2	2	1	2	1	1	**1.6**
T3.3 Mobilisation of multiple benefits	1	1	1	0	2	0	1	1	**0.9**
T4.1 Proactive targeting of vulnerable households	3	2	1	3	3	2	2	2	**2.3**
T4.2 Affordability and activation of the rental market	2	2	0	2	2	2	1	0	**1.4**
T4.3 Social safeguards	2	2	1	2	2	1	2	1	**1.6**
T5.1 Life-cycle climate and environmental impacts	1	1	0	1	0	1	1	1	**0.8**
T5.2 Climate resilience	1	2	0	1	2	1	1	0	**1.0**

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.2	**What the plan contains.** Residential trajectory: specific space-heating demand (RHEV) from 87 to 68.5 kWh/m²·yr by 2050 (about −21%), with five-year milestones; after 2035 an improvement of 8% per decade is assumed. No forward renovation-rate target; observed effective rate 1.58% to 3.30% a year (1990-2020). MEPS and ZEB thresholds in OIB Directive 6 (September 2025; worst 16% by 2030, 26% by 2033), not yet in the Länder building ordinances, with an implementation obligation from May 2026; several Länder tables blank. Heating: fossil heating phased out by 2040. BACS: the smart-technology section addresses electric mobility, not building automation; windows nearly absent.
	Flagship features. MEPS and ZEB thresholds published in OIB Directive 6 (September 2025), ahead of transposition by the Länder. Fossil-heating phase-out by 2040, with a fossil and non-fossil share trajectory to 2050.
	Priority improvements. **For the final plan:** Secure national coordination across the Länder on MEPS trigger points and aggregation of renovation rates. **Delivery:** Transpose the OIB Directive 6 thresholds into the Länder building ordinances. **For the final plan:** Introduce a BACS requirement.
S2 **Delivery architecture & implementation capacity** Score 1.2	**What the plan contains.** One-stop shops: no national network; Länder advisory bodies (Upper Austria's Energy Saving Association operates continuously) and a federal energy-poverty one-stop-shop pilot (August 2025 to March 2026), without a scaling plan. Public buildings: about 640 service buildings a year, about 330 of them to nZEB level (EED Articles 5 to 7). Workforce: dedicated chapter focused on under-represented groups, no quantified gap; the 60,000 green jobs by 2030 are a Lower Austria measure, not a federal target. Area-based approach conceptual.
	Flagship features. Federal one-stop-shop pilot for vulnerable households (August 2025 to March 2026), with a guideline for replication by the Länder.
	Priority improvements. *Not a priority at this stage.*
S3 **Finance & political attractiveness** Score 1.3	**What the plan contains.** Investment needs (chapter 4): thermal renovation of housing €3.1bn a year rising to €4.2bn, non-residential €5.5bn to €6.1bn; €15.6bn a year private and €3.2bn a year public; chapter 2 gives a different series (about €195bn in total, €10bn a year), not reconciled. The chapter is marked as not finalised. No source of funds is identified; the plan states it remains open whether support is possible under the excessive deficit procedure. Programme of €1.8bn over 2026-2030 (at most €360m a year). Toolbox grant-based and split across Länder (housing subsidy, klimaaktiv), without guarantees or revolving funds. Multiple benefits deferred.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Finalise the finance chapter, identify the sources of funds and add a private-leverage instrument. **For the final plan:** Estimate the wider benefits rather than deferring them.
S4 **Social robustness** Score 1.8	**What the plan contains.** Energy poverty quantified under three definitions (7.9%, 8.5% and 12.1% of households), with income shares (5.1% on average, 14.9% for the lowest decile). Delivery: the federal kea Coordination Centre for Combating Energy Poverty (€1m a year, 2023-2030), Wohnschirm Energie through Caritas, Länder instruments such as Salzburg's €5.40/m² fee cap. Rental market protection-oriented, without a split-incentive mechanism. Affordable housing through the Länder housing-promotion schemes.
	Flagship features. Federal kea Coordination Centre for Combating Energy Poverty (€1m a year, 2023-2030), above Länder instruments, with energy poverty quantified under three definitions.
	Priority improvements. *Not a priority at this stage.*
S5 **Long-term quality & future-proofing** Score 0.9	**What the plan contains.** Whole-life carbon: no national roadmap; Länder measure cards, with the OI3 index used in some Länder; harmonised life-cycle GWP rules in preparation in OIB Directive 7 (adoption expected Q2 2027). Climate resilience incidental: an exemplary-projects programme (2024), the Vienna Climate Roadmap, dissemination through the KEM and KLAR! regional networks.
	Flagship features. *None identified.*
	Priority improvements. *Not a priority at this stage.*

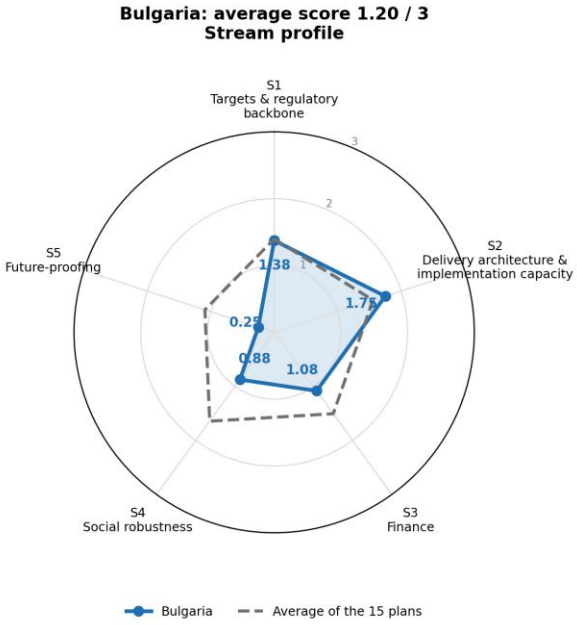
Quantitative market snapshot

Indicator	Up to 2030	After 2030
Residential renovation rate	No target; observed effective rate 1.58% to 3.30% a year (1990-2020)	No target; 8% per decade is the assumed improvement in space-heating demand after 2035, not a rate
Residential renovation depth	Major renovation target about 69 kWh/m²·yr	Not stated in the plan
Non-residential renovation	About 3,000 service buildings a year (estimate, not a target); MEPS: worst 16% by 2030	MEPS: worst 26% by 2033
Residential investment need	Thermal renovation €3.1bn a year rising to €4.2bn (chapter 4); different series in chapter 2	Not stated as a period total
Non-residential investment need	€5.5bn rising to €6.1bn a year	Not stated as a period total
Public finance	€3.2bn a year (chapter 4); programme of €1.8bn over 2026-2030 (at most €360m a year); no source of funds identified	Not stated in the plan
Private finance	€15.6bn a year (€10.7bn residential, €4.9bn non-residential)	Not stated in the plan
One-stop shops	No national one-stop shop; Länder advisory bodies and a federal pilot (August 2025 to March 2026)	Not stated in the plan
Workforce need	No federal target; Lower Austria: more than 60,000 green jobs by 2030	Not stated in the plan
Heating systems	Heat pumps and district heat with rising renewable share	Fossil heating phased out by 2040
Energy poverty	7.9%, 8.5% or 12.1% of households depending on the definition; kea €1m a year (2023-2030)	Not stated in the plan
Building stock	About 2.35 million buildings, 4.85 million dwellings (2020)	Not applicable

Sources: Austrian draft NBRP (December 2025); figures as stated in the plan.

Bulgaria

The Bulgarian NBRP sets MEPS thresholds by building use, a legal definition and annual monitoring of energy poverty, a workforce roadmap (BUILD UP Skills Bulgaria 2030) and a National Decarbonisation Fund. One-stop shops exist only as pilots, training capacity falls well short of the roadmap, and the rental market, social safeguards, multiple benefits, life-cycle carbon and climate resilience are barely addressed.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	Topic score
T1.1 National trajectory for residential buildings	2	2	3	1	1	1	1	2	**1.6**
T1.2 MEPS for non-residential buildings	3	2	3	2	1	2	2	2	**2.1**
T1.3 ZEB thresholds / nZEB conversion	2	2	2	0	0	1	1	1	**1.1**
T1.4 Fossil-fuel phase-out and heat decarbonisation	3	2	2	2	2	2	1	2	**2.0**
T1.5 TBS and BACS requirements	1	1	0	1	1	2	1	1	**1.0**
T1.6 Performance of glazed areas	1	0	0	0	1	0	1	0	**0.4**
T2.1 One-stop shops	2	2	2	1	2	2	2	1	**1.8**
T2.2 Workforce	3	2	2	2	1	2	1	1	**1.8**
T2.3 Area-based / integrated approach	2	2	0	1	1	1	2	1	**1.3**
T2.4 Mobilisation of public buildings	3	2	3	2	1	3	2	2	**2.3**
T3.1 Financing of investments and needs	2	1	2	1	1	1	1	1	**1.3**
T3.2 Diversified and scalable financing	2	2	1	2	2	2	2	1	**1.8**
T3.3 Mobilisation of multiple benefits	1	0	0	0	1	0	0	0	**0.3**
T4.1 Proactive targeting of vulnerable households	2	1	1	2	2	1	2	1	**1.5**
T4.2 Affordability and activation of the rental market	1	1	1	0	1	0	1	0	**0.6**
T4.3 Social safeguards	1	1	0	0	1	0	1	0	**0.5**
T5.1 Life-cycle climate and environmental impacts	1	1	0	0	0	0	1	0	**0.4**
T5.2 Climate resilience	0	0	0	0	0	0	1	0	**0.1**

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.4	**What the plan contains.** Observed residential renovation rate 0.47% a year (2025 database of the Sustainable Energy Development Agency, SEDA): 0.01% light, 0.38% medium, 0.08% deep; no reporting system for non-residential renovation. MEPS thresholds in kWh/m² by building use (for example administrative 488, schools 188, commercial 813), consistent with the 16% and 26% milestones; ZEB thresholds by building type, indicative. Heating: boilers phased out by 2040, renewable district heating by 2050. Public buildings: 3% a year renovation of buildings above 250 m² and 1.9% a year energy reduction (EED). BACS and building management valued, with future smart-readiness integration, but no requirements, thresholds or enforcement.
	Flagship features. MEPS thresholds in kWh/m² for more than nine building uses, integrated with SEDA compliance checks and digital labelling.
	Priority improvements. *Not a priority at this stage.*
S2 **Delivery architecture & implementation capacity** Score 1.8	**What the plan contains.** Workforce: BUILD UP Skills Bulgaria 2030 roadmap, from 198,200 workers (2022) to 249,587 needed in 2030, 52,368 to reskill, five priority areas and 21 measures; current output 4,500-5,000 certified a year, fewer than 10% in energy efficiency or renewables. One-stop shops: network of integrated service centres (at least one per 80,000 inhabitants), hybrid model with accredited private or mixed providers, based on pilots in six cities (SHEERenov+, MultiHome), to replace or complement the 28 regional information centres, which the plan says lack capacity; no national budget or staffing; the plan states that EPBD Article 18 compliance is not achieved.
	Flagship features. BUILD UP Skills Bulgaria 2030 roadmap: 52,368 workers to reskill by 2030, five priority areas, 21 measures and the legal changes required.
	Priority improvements. **For the final plan:** Attach budgets, annual training-output targets by qualification level and monitoring indicators to the five priority areas of the skills roadmap.
S3 **Finance & political attractiveness** Score 1.1	**What the plan contains.** Investment needs partial: about €48bn cumulative by 2050 for non-residential buildings; residential given only as an indicative range (€2-35bn); public resource used to date about BGN 6.33bn across successive programmes; Annex II table empty. National Decarbonisation Fund: pilot deep-renovation schemes combining about 49.9% grants with loans, guarantees and blending. Private finance: limited engagement of commercial banks, no amount. Multiple benefits not quantified.
	Flagship features. National Decarbonisation Fund: pilot deep-renovation schemes combining about 49.9% grants with loans, guarantees and blending.
	Priority improvements. **For the final plan:** Quantify the health, social and economic benefits and use them to allocate funding.
S4 **Social robustness** Score 0.9	**What the plan contains.** Energy poverty: legal definition (Energy Act Article 38e, 2023), household status set by Decree 24/2025, annual monitoring by SEDA: 1.83 million people, 28.47% of households. The plan relays a recommendation of the Bulgarian Academy of Sciences to direct at least one third of investment to energy-poor households, not adopted as a rule. Rental market, social safeguards and affordable housing near absent; about 41% of rural dwellings are vacant, making inactive owners a specific challenge.
	Flagship features. Legal energy-poverty framework: definition in the Energy Act (2023), household status by decree (2025) and annual monitoring by SEDA.
	Priority improvements. **For the final plan:** Address affordable housing, vacant dwellings and inactive or fragmented owners. **For the final plan:** Add affordability safeguards and protection against renoviction.
S5 **Long-term quality & future-proofing** Score 0.3	**What the plan contains.** Life-cycle carbon and climate resilience largely absent: EN 15804 methodology referenced without a timetable; no risk mapping.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Develop a climate-resilience strategy linked to the plan: mapping of heat, flood and extreme-weather risks, resilience in renovation packages.

Quantitative market snapshot

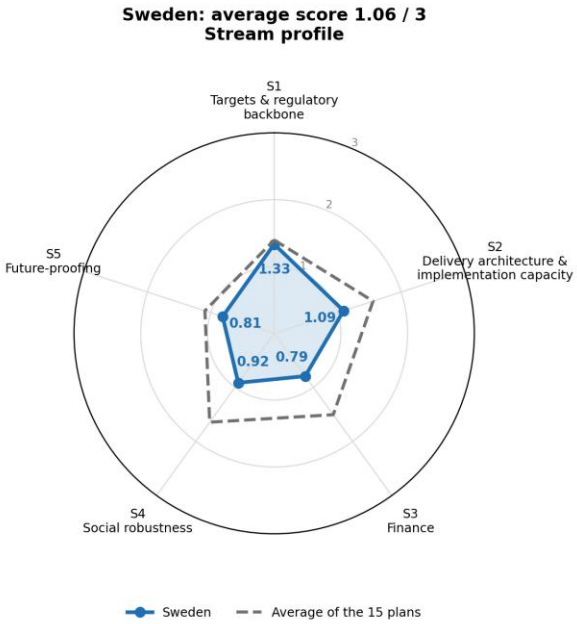
Indicator	Up to 2030	After 2030
Residential renovation rate	0.47% a year observed (2025): light 0.01%, medium 0.38%, deep 0.08% (1.43 million m²)	Not stated in the plan
Non-residential renovation	No national reporting system	Not stated in the plan
Residential investment need	Indicative range of €2-35bn (period unclear in the draft)	Not stated in the plan
Non-residential investment need	Not stated by period	About €48bn cumulative by 2050; annual volumes rising after 2035-2040
Public finance	About BGN 6.33bn used to date across programmes	Not stated in the plan
Private finance	No amount stated	Not stated in the plan
One-stop shops	Network planned (at least one per 80,000 inhabitants), pilots in six cities; funded by service fees and the National Decarbonisation Fund; Article 18 compliance not yet achieved	Not stated in the plan
Workforce need	52,368 to reskill by 2030 (from 198,200 workers in 2022 to 249,587 needed); output 4,500-5,000 certified a year	Not stated in the plan
Building stock	29,562 multi-family buildings (79.98 million m², 35.99% of the stock); more than 64% built 1960-1999	Not applicable

Sources: Bulgarian draft NBRP; figures as stated in the plan.

Sweden

Reading note: the Swedish NBRP is an early draft; it states that its results are "not final or a pledge", that national renovation targets have not been set and that investment needs could not be calculated. Several low scores reflect this incompleteness; others reflect structural choices (no social housing in the Directive sense, energy poverty handled through general welfare).

The Swedish NBRP draws on a heating system already largely fossil-free, a long-standing nZEB regime, a municipal energy and climate advisory service in all municipalities and a mandatory climate declaration for new buildings. National targets, investment needs and a financing toolbox are not yet set, area-based approaches are near absent, and climate resilience is only touched on.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	**Topic score**
T1.1 National trajectory for residential buildings	2	2	2	1	1	1	1	2	**1.5**
T1.2 MEPS for non-residential buildings	2	1	2	1	0	0	1	2	**1.1**
T1.3 ZEB thresholds / nZEB conversion	2	2	2	2	0	1	1	2	**1.5**
T1.4 Fossil-fuel phase-out and heat decarbonisation	1	3	2	2	1	2	1	2	**1.8**
T1.5 TBS and BACS requirements	2	2	1	2	0	1	1	2	**1.4**
T1.6 Performance of glazed areas	1	2	0	2	0	0	1	0	**0.8**
T2.1 One-stop shops	3	3	1	2	1	2	1	1	**1.8**
T2.2 Workforce	2	2	1	1	1	1	1	2	**1.4**
T2.3 Area-based / integrated approach	1	0	0	0	0	0	1	0	**0.3**
T2.4 Mobilisation of public buildings	2	1	1	0	0	1	1	2	**1.0**
T3.1 Financing of investments and needs	1	1	1	1	0	0	1	0	**0.6**
T3.2 Diversified and scalable financing	2	2	0	1	0	1	1	0	**0.9**
T3.3 Mobilisation of multiple benefits	2	1	1	0	1	0	1	1	**0.9**
T4.1 Proactive targeting of vulnerable households	2	1	1	1	1	0	1	2	**1.1**
T4.2 Affordability and activation of the rental market	2	1	0	1	1	0	1	0	**0.8**
T4.3 Social safeguards	1	2	0	1	1	0	1	1	**0.9**
T5.1 Life-cycle climate and environmental impacts	2	3	0	3	0	0	1	0	**1.1**
T5.2 Climate resilience	1	1	0	1	0	0	1	0	**0.5**

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.3	**What the plan contains.** Trajectory to 2030 and 2035, marked "not final or a pledge": all-building renovation rate from 2.15% (2020) to 4.61%, average depth from about 9.4% to 30% (2030); 2040 and 2050 empty; the alternative Article 9(2) method is not yet calculated. Deep renovation 0.08% of residential buildings in 2023. Non-residential MEPS: percentile analysis (16% and 26%), provisional. nZEB regime in the Boverket building regulations. Heating: district heating 82% fossil-free, residential fossil share 11%, renewable share of building energy 89% by 2030; no phase-out strategy.
	Flagship features. Largely fossil-free heat supply: district heating 82% fossil-free and a renewable share of building energy rising to 89% by 2030.
	Priority improvements. **For the final plan:** Set national renovation targets and complete the Article 9(2) method.
S2 **Delivery architecture & implementation capacity** Score 1.1	**What the plan contains.** Municipal energy and climate advisory service in all municipalities for more than 40 years (about 140 advisers, about 20,000 calls a year, SEK 90m for 2025), designated as the basis for the one-stop shop; no end-to-end renovation support yet and no throughput target. Workforce: capacity analysis from labour-market data (construction employment 382,587 in 2023, forecast by education and age); shortages of energy auditors flagged, no quantified gap. Area-based approaches near absent. Public buildings quantified (67.9 million m² publicly owned), without a distinct programme.
	Flagship features. Municipal energy and climate advisory service in every municipality, the base for the one-stop shop.
	Priority improvements. **For the final plan:** Extend the advisory service into a one-stop shop with end-to-end renovation support. **For the final plan:** Develop an area-based renovation programme.
S3 **Finance & political attractiveness** Score 0.8	**What the plan contains.** Investment needs not calculated because targets are not set; only indicative external 2022 estimates (multi-dwelling about SEK 18bn, single-family about SEK 40bn, premises about SEK 10bn). Funding runs through the annual Budget Bill; no dedicated renovation-financing toolbox; Annex II table empty. Multiple benefits (jobs, comfort, health) mentioned, not consolidated.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Calculate investment needs once targets are set and build a dedicated financing toolbox.
S4 **Social robustness** Score 0.9	**What the plan contains.** Energy poverty quantified for the Social Climate Plan (5.2% of the single-family population in 2020; people at inadequate indoor temperature from 280,000 to 622,000 over 2020-2023), with three proposed indicators, no reduction target and no renovation instrument. Social response through general welfare: housing allowance, housing supplement (SEK 14.4bn), old-age support, anti-disconnection rules. Rental market: rents include utilities; efficiency works give no ground for a rent increase. No social housing in the Directive sense.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Turn the energy-poverty indicators into a reduction target and a renovation-linked instrument.
S5 **Long-term quality & future-proofing** Score 0.8	**What the plan contains.** Mandatory climate declaration for new buildings since 1 January 2022; roadmap for life-cycle GWP limit values (EPBD Article 7(5)) due 1 June 2026; limit values not set. Climate resilience only through indoor-temperature health guidance; no instrument, target or exposure assessment.
	Flagship features. Mandatory climate declaration for new buildings since 1 January 2022.
	Priority improvements. **For the final plan:** Develop a building-level climate-resilience instrument.

Quantitative market snapshot

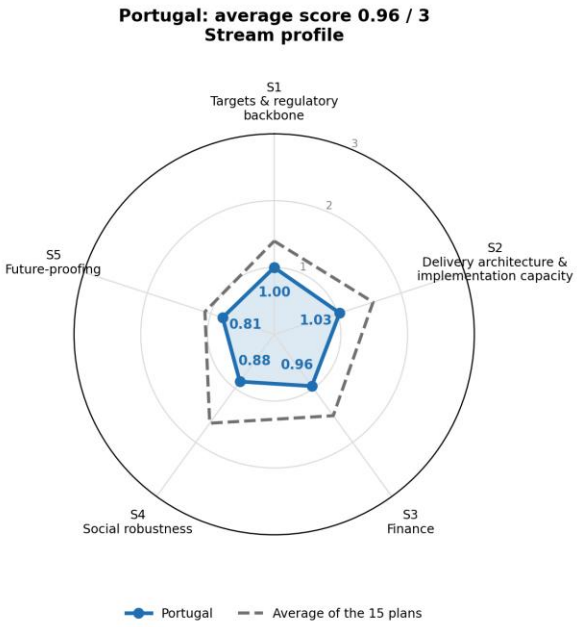
Indicator	Up to 2030	After 2030
Residential renovation rate	2023 observed: 72,598 buildings (13.68 million m²): light 1.82%, medium 0.41%, deep 0.08%. All buildings: 2.15% (2020) to a 4.61% target; 52.8% of the residential stock renovated cumulatively over 2020-2030	Analyses to 2035 only; 2040 and 2050 empty
Residential renovation depth	Average depth 9.37% (2020) to 30.0% (2030)	Not stated in the plan
Non-residential renovation	2023 observed: 1,401 buildings, 4.17 million m² (public 313, 0.93 million m²); 19.1% of the stock renovated cumulatively over 2020-2030	Not stated in the plan
Residential investment need	Not calculated; indicative external estimate (2022): multi-dwelling about SEK 18bn, single-family about SEK 40bn	Not calculated
Non-residential investment need	Not calculated; indicative external estimate about SEK 10bn for premises	Not calculated
Public finance	Not quantified; annual Budget Bill	Not stated in the plan
Private finance	Not quantified	Not stated in the plan
One-stop shops	Advisory service in all municipalities: about 140 advisers, 20,000 calls a year, SEK 90m for 2025; no throughput target	Annual appropriation, no multi-year envelope
Workforce need	No quantified gap; construction employment 382,587 (2023)	Not stated in the plan
Heating systems	Renewable share of building energy 76% (2020) to 89% (2030 target); residential fossil share 13% to 11%; solar PV at least 5,900 MW by 2030	Not stated in the plan

Sources: Swedish draft NBRP; figures as stated in the plan.

Portugal

Reading note: the Portuguese NBRP, assessed on the May 2026 draft, repeatedly marks key provisions as "not started", "not budgeted" or "to be determined"; several zero scores reflect this incompleteness rather than an absence of building policy in Portugal.

The Portuguese NBRP sets a 2050 trajectory, provisional ZEB thresholds for residential buildings, energy-poverty targets for 2030, 2040 and 2050, and a financing approach that includes condominiums. The investment chapter contains no figures, the one-stop-shop network has no budget, social safeguards are almost absent, and public buildings have no lead-by-example strategy.



	Explicit-ness	Maturity	Quant. ambition	Delivery credibility	Social robustness	Scala-bility	Integra-tion	Evalu-ability	**Topic score**
T1.1 National trajectory for residential buildings	3	2	3	1	1	1	1	2	**1.8**
T1.2 MEPS for non-residential buildings	2	1	1	1	0	0	1	2	**1.0**
T1.3 ZEB thresholds / nZEB conversion	2	2	2	1	1	1	1	2	**1.5**
T1.4 Fossil-fuel phase-out and heat decarbonisation	1	1	1	1	0	1	1	1	**0.9**
T1.5 TBS and BACS requirements	1	1	0	0	0	0	1	1	**0.5**
T1.6 Performance of glazed areas	1	1	0	0	0	0	1	0	**0.4**
T2.1 One-stop shops	2	2	2	1	2	1	2	2	**1.8**
T2.2 Workforce	2	1	1	1	1	1	1	0	**1.0**
T2.3 Area-based / integrated approach	2	1	1	1	1	1	1	1	**1.1**
T2.4 Mobilisation of public buildings	1	0	0	0	0	0	1	0	**0.3**
T3.1 Financing of investments and needs	1	0	0	0	0	0	0	0	**0.1**
T3.2 Diversified and scalable financing	2	1	1	1	2	1	2	1	**1.4**
T3.3 Mobilisation of multiple benefits	2	1	1	1	2	1	2	1	**1.4**
T4.1 Proactive targeting of vulnerable households	2	1	2	1	2	1	2	2	**1.6**
T4.2 Affordability and activation of the rental market	2	1	0	1	1	1	1	0	**0.9**
T4.3 Social safeguards	1	0	0	0	0	0	0	0	**0.1**
T5.1 Life-cycle climate and environmental impacts	2	1	0	0	0	1	2	0	**0.8**
T5.2 Climate resilience	2	1	0	1	1	1	1	0	**0.9**

Analysis by stream

S1 **Targets, standards & regulatory backbone** Score 1.0	**What the plan contains.** Trajectory to 2050: from 175 to 143 kWh/m²·yr in 2030 and 108 in 2050 (−38%), with renovation volumes falling in 2031-2040; observed residential rate 1.77% of floor area in 2023, average depth 45.7% (target 63.9% for 2020-2030). MEPS referenced (worst 16% by 2030, 26% by 2033), not binding. Residential ZEB thresholds set, provisional; ZEB obligation for new public buildings from 2028 and all new buildings from 2030. BACS: promotion, interoperability and smart readiness referenced, not binding requirements. Windows absent.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Raise the ambition of the 2050 trajectory and smooth the renovation volumes, which fall in 2031-2040.
S2 **Delivery architecture & implementation capacity** Score 1.0	**What the plan contains.** One-stop shops: Rede Espaço Energia, a national network coordinated by the energy agency ADENE, covering technical, administrative, legal and financial advice; coverage criteria from EPBD Article 18; no budget, staffing or service-level figures; status "not started" (2027-2030). Workforce: shortfall of about 80,000 construction professionals (industry association AICCOPN), expected to worsen; skills gaps in circularity, BIM and energy performance. Area-based approach referenced. Public buildings: 257 units renovated in 2023; no lead-by-example strategy.
	Flagship features. *None identified.*
	Priority improvements. **For the final plan:** Set a renovation rate for public buildings and give them a market-shaping role.
S3 **Finance & political attractiveness** Score 1.0	**What the plan contains.** The investment chapter (Chapter 4) contains method text only: no total, no public and private split, no period breakdown; the Annex II table is present but zero-filled. Financing toolbox at design stage, explicitly including condominiums and collective decision-making structures.
	Flagship features. Financing approach that explicitly includes condominiums and collective decision-making structures.
	Priority improvements. **For the final plan:** Quantify total investment needs and the public and private split.
S4 **Social robustness** Score 0.9	**What the plan contains.** Energy poverty: 1.8 to 3 million people affected; reduction targets for 2030, 2040 and 2050, in line with the National Strategy to Combat Energy Poverty. Rental market (about 18% of dwellings): split incentive identified; tax incentives when buildings reach nZEB or ZEB. Social safeguards almost absent (no protection against renoviction, no rent conditions); affordable-housing programmes cited as context only.
	Flagship features. Energy-poverty reduction targets for 2030, 2040 and 2050, linked to the National Strategy to Combat Energy Poverty. Tax incentives for rented buildings renovated to nZEB or ZEB.
	Priority improvements. **For the final plan:** Add social safeguards and protection against renoviction. **For the final plan:** Link renovation with affordable-housing programmes through joint instruments.
S5 **Long-term quality & future-proofing** Score 0.8	**What the plan contains.** Life-cycle carbon: GWP methodology under development (2028-2033), no limit values; a circularity measure (eco-design, bio-based and secondary materials). Climate resilience: nature-based solutions, urban heat and stormwater recognised; a water-energy measure for drought resilience; no binding integration.
	Flagship features. *None identified.*
	Priority improvements. *Not a priority at this stage.*

Quantitative market snapshot

Indicator	Up to 2030	After 2030
Residential renovation rate	1.77% of floor area observed in 2023 (76,625 units, 11.34 million m²); the plan says this is under-estimated	Trajectory: 108 kWh/m²·yr in 2050; volumes falling in 2031-2040
Residential renovation depth	Observed average depth 45.7% (2023: light 0.43%, medium 0.60%, deep 0.74%); target 63.9% for 2020-2030 (45,200 light, 87,154 medium, 71,185 deep units a year)	Not stated in the plan
Non-residential renovation	0.05% observed in 2023 (1,139 units, 879,671 m², average depth 39.8%); denominator not stated	Not stated in the plan
Public buildings	257 units, 515,613 m² renovated in 2023 (average depth 49.3%)	Not stated in the plan
Investment need and financing	Not stated: Chapter 4 contains the method only; Annex II table zero-filled	Not stated in the plan
One-stop shops	Rede Espaço Energia coordinated by ADENE; coverage criteria from EPBD Article 18; no budget; status "not started", 2027-2030	Target: 100% of the minimum coverage criterion
Workforce need	Shortfall of about 80,000 construction professionals (AICCOPN), expected to worsen	Not stated in the plan
Rental stock	About 18% of dwellings rented (2023)	Not applicable

Sources: Portuguese draft NBRP (May 2026); figures as stated in the plan.