Feedback on the Draft National Building Renovation Plan (NBRP) of France

France submitted a partially complete draft NBRP on 21 April 2026. Even though several important elements are missing as further described, the draft NBRP sets a **roadmap** towards achieving a highly energy-efficient and decarbonised building stock by 2050 by targeting **reductions** in **primary energy** consumption and **GHG emissions** of the building sector of respectively **24%** and **96%** compared to 2020 levels.

To support the implementation of the plan, France plans ambitious regulatory measures **prioritising the renovation of worst-performing residential** buildings and requirements similar to **minimum energy performance standards** for large **non-residential buildings**.

The draft NBRP also includes some **good practices** such as **district and neighbourhood** approaches combining renovation and complementary urban planning measures. France already has in place a national regulation that requires **the calculation of life-cycle GHG emissions** of new buildings and introduced maximum emission limit values ahead of the timeline set out in EPBD.

At the same time, France is invited to take due account of the proposed **improvements** when developing the final version of its NBRP to be submitted by 31 December 2026:

1. Define the **MEPS thresholds** for all non-residential buildings in accordance with Article 9(1) of the Energy Performance of Buildings Directive (EPBD and provide the methodology to identify the 16% and 26% worst-performing non-residential buildings.

2. Provide the **trajectory for residential building renovation** in accordance with Article 9(2).

3. Ensure that the **energy and GHG emissions roadmap targets** are aligned with the projected evolution of energy generation in the final National Energy and Climate Plan (NECP) from 2024, and that the primary energy factors and emission factors reflect this evolution. Clarify why the 2030 NBRP GHG emissions target for the building sector is less ambitious than the one in the final 2024 NECP.

4. Consolidate the renovation targets by providing a **2040 GHG emissions target.** Check and validate the **renovation targets** (number and floor area) **for non-residential buildings** and ensure consistency with the baseline and the energy and emission targets.

5. Provide a national definition for **energy poverty** in line with Article 2(52) of Directive (EU) 2023/179 and ensure that the energy poverty indicator reflects the multidimensionality of energy poverty and include the methodology to calculate the rate.

6. Set **targets for energy poverty** reduction for 2030, 2040 and 2050, in line with NECP targets.

7. Include estimates of the **impacts** of all **policies and measures** in terms e.g. of expected energy savings, GHG emissions reductions, number of renovated buildings or other indicators.

8. Clarify how the reported policies and measures on the **decarbonisation of heating** are effectively setting a pathway to a complete phase-out of fossil fuel boilers by 2040.

9. Complete the assessment of **investment needs** by providing estimates up to **2040 and 2050** and identify funding and financing sources, including mobilisation of private finance, administrative resources, allocations for the worst-performing buildings and financing measures contributing to the planned reduction of energy poverty.

10. Set a target for increasing **the share of renewable energy in buildings** and complete the targets for **deployment of solar technologies** in buildings for the years beyond 2030.

11. Indicate the contribution to the Union's **energy efficiency** and **renewable energy targets** attributable to the building stock renovation.

12. Clarify how the elements specific to the draft NBRP were addressed in the **public consultations** that were carried out for other national plans and how the consultation's feedback has been integrated into the draft NBRP.