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

Bulgaria submitted a comprehensive albeit partially complete draft NBRP ahead of the deadline stipulated in Article 3 of the recast EPBD. The draft NBRP sets a **roadmap** towards a more energy-efficient and decarbonised building stock by 2030 targeting **reductions** in **primary energy** consumption and **GHG emissions** of the building sector of respectively **13%** (vs 2020) and **4%** (vs 2023).

The draft NBRP outlines a comprehensive framework for Minimum Energy Performance Standards (**MEPS**) for non-residential buildings, featuring a simplified mechanism for identification and compliance, synergy with cost-optimality, and financial and technical assistance, as well as information measures. Additionally, it provides a detailed description of the **building renovation passport** scheme and considers **accessibility** aspects in the overview of the building stock

The draft NBRP offers a comprehensive explanation of the methodology used to calculate the **energy poverty rate**, clearly identifying the underlying indicators and data sources.

At the same time, Bulgaria 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. Complete the overall **final** and **primary energy** consumption and **greenhouse gas** emissions **targets** beyond 2030 and until 2050 by including the perspective of the **residential** building stock.
2. Ensure that the operational **GHG emissions targets** in the building sector are sufficient to achieve the national commitment on decarbonisation laid down in the NECP and in line with the objective of a **decarbonised** building stock by 2050.
3. Provide a clear baseline and milestones in average primary energy use for 2030, 2035 2040 and 2050 for the national **trajectory for the residential building stock** and estimates of the corresponding residential buildings to renovate. Include the contribution of the renovation of the worst-performing residential buildings.
4. Provide the **2040 and 2050 MEPS thresholds** for non-residential buildings in terms of primary or final energy demand (kWh/m^2y).
5. Include estimates of the **impacts** of **policies and measures** for the overall targets, including expected energy savings, energy poverty reduction, GHG reductions and number of renovated buildings or other relevant indicators.
6. Provide targets for the share of **renewable energy** and quantify the contribution towards the overall renewable energy targets (Directive (EU) 2018/2001).
7. Provide the numerical targets for the deployment of **solar energy** in buildings for 2030 and until 2050.
8. Include credible measures to ensure the **phase-out of fossil fuel boilers by 2040** and ensure the consistency of these measures with other plans, including the National Energy and Climate Plan (NECP).

9. Complete the estimation of **investment** needs and clarify **financing sources**, in particular for residential buildings and up to 2050, in relation to policies and measures for the entire period.
10. Clarify the mechanisms for mobilising **private capital**, expected volumes and timelines.
11. Set **energy poverty** targets for the years 2040 and 2050. Ensure the consistency of the energy poverty national definition with the Article 2(52) of Directive (EU) 2023/1791 (revised EED).
12. Provide measures dedicated to the alleviation of **energy poverty** and **inadequate housing**.