

The EPBD directive and Spain's eight million homes: what the law says and what it doesn't

Since January a figure has been circulating that appears in no official document. The directive and the plan Spain has sent to Brussels tell a different story, and for owners of older houses it is no less demanding.

In January 2026 several Spanish outlets reported that more than eight million homes in Spain would have to undergo an energy retrofit before 2030. The argument was always the same: from that year on, a flat without at least an E on its energy performance certificate could no longer be sold or let. The figure was attributed to the Ministry of Housing, yet none of the articles linked to a document, and there is no trace of it on the ministry's website.

The European Commission's Representation in Spain had already denied it on 21 October 2025, in a [note answering exactly that rumour](#). The EU sets no minimum rating for homes, does not restrict their sale or rental and imposes no renovation obligation on individual owners. What the directive does do makes fewer headlines, but over the medium term it will weigh more on the value of a house than the imaginary ban.

In May we looked at [what the new Spanish building code changes for new construction](#), with carbon footprint as the headline measure. This article deals with the other half of the problem, which is far larger: the buildings that already exist.

What the EPBD requires of existing homes

[Directive \(EU\) 2024/1275](#), the recast Energy Performance of Buildings Directive (EPBD), was adopted on 24 April 2024, and member states had until 29 May 2026 to transpose it. For existing homes, the core obligation sits in Article 9(2), and it falls on the state rather than on individual owners. Each country must cut the average primary energy use of its residential stock by at least 16% by 2030 and by 20% to 22% by 2035, both against 2020.

The condition that shapes everything else follows: at least 55% of that reduction must come from renovating the 43% worst-performing residential buildings. Public policy will therefore have to concentrate on the houses and blocks that consume the most. Non-residential buildings do face minimum energy performance standards with a timetable (Article 9(1)). Homes do not.

Other elements will reach owners indirectly. The renovation passport (Article 12) is a staged roadmap for taking a building to zero emissions; states must make it available, but it remains voluntary unless the government makes it mandatory. Energy certificates will move to a harmonised A to G scale (Article 19), where A means a zero-emission building and G the worst-performing buildings in each national stock. Since 1 January 2025, stand-alone fossil fuel boilers can no longer be subsidised (Article 17(15)), and national plans must include their complete phase-out by 2040 at the latest. That last point is a planning objective, not a ban written into the articles.

The real figures in Spain's plan

Spain sent Brussels the draft of its National Building Renovation Plan on 30 December 2025, and the final version must be approved before the end of 2026. It is the document that sets out how many homes the country intends to renovate, and its numbers bear no resemblance to eight million.

Between 2020 and 2030 the draft plan foresees 4,455,000 renovated homes, the vast majority through light measures: 300,000 deep renovations, 916,946 medium ones and 3,238,054 light ones. The document itself converts this into 1,567,986 deep-renovation equivalents. The worst-performing 43% of the stock, the segment the directive puts at the centre, amounts to 7,157,926 homes in 3,799,163 buildings, and the plan sets their full renovation for 2050, not 2030. Up to 2030 it expects 2,385,975, at a pace of 238,598 a year.

Only one figure in the document comes close to eight million: the 8.1 million primary residences that were heated with natural gas or oil products in 2021, which the plan aims to bring down to around two million by 2040. It is about heating. It says nothing about compulsory works before 2030.

A large, old and poorly rated housing stock

According to the 2021 census by Spain's statistics office (INE), Spain has 26,623,708 dwellings, of which 18,536,616 are primary residences. Almost half of all buildings, 49.3% according to the draft plan, were built before 1980, when Spain's first thermal standard, NBE-CT-79, was only just coming into force. And 58% of the worst-performing residential buildings date from that period.

Energy certificates paint the same picture. Of the 4,557,452 residential certificates registered in Spain in 2023, 85.1% carried an E, F or G for energy use. In Catalonia, out of 1,079,129 certificates, the share is close to 89%. The data is skewed, because only homes that are sold or let get certified, so it is not a complete picture of the stock. But no other source points the other way.

The pace is more worrying than the volume. The draft counts around 540,000 renovations a year between 2020 and 2023, without distinguishing their depth. Deep renovations, counted through architects' professional body approvals, came to 31,532 a year, and in 2023 they accounted for 0.17% of the stock. The gap between these figures and the targets explains why the plan leans so heavily on light measures.

Spain is running late

The transposition deadline passed on 29 May. On 15 July the European Commission sent [letters of formal notice to all twenty-seven member states](#), Spain included, for failing to transpose the directive in full. The next step in the infringement procedure is a reasoned opinion. According to Green Building Council España, by May Spain had transposed around 60% of the provisions. The amendment to the building code that carries part of it over, including whole-life carbon calculation, went to public consultation in November and December 2025 and, at the time of writing, has still not been published in the Official State Gazette (BOE).

For owners, the delay has a practical reading: the detailed rules (how the new scale will be calculated, who will issue passports, what support will be available) are not final yet. Waiting for them before starting to think about the house makes little sense, though, because the direction has been set since 2024.

Where it will show: in price and in bills

With no ban on selling, the pressure arrives by a slower and more reliable route, which is price. In May 2025 the Bank of Spain published a [study covering more than a million sales](#) between 2015 and 2022. A home rated A or B sold on average for 9.7% more than a comparable F or G home, and the gap widened to 18.3% in 2022. For detached houses the premium was close to 19.5%. IESE business school and the valuer Tinsa, analysing 243,414 properties between 2012 and 2024, estimate that each letter of improvement adds 1.3% to value on average.

Energy bills will follow a similar path. The new EU emissions trading system for buildings and road transport, ETS2, becomes fully operational in 2028 and will put a price on the CO₂ from heating fuels, which is expected to make heating a house with gas or heating oil more expensive. To cushion the impact, the Social Climate Fund will mobilise €86.7 billion across the EU between 2026 and 2032; the plan Spain has put out for public consultation allocates €9,099 million, €4,723 million of it to buildings.

Current grants also have deadlines. The residential retrofit programmes funded by Next Generation EU, the EU recovery funds, set 30 June 2026 as the deadline for completing works, and Spain's State Housing Plan 2026–2030 has opened the door to extending them. Our [guide to retrofit grants in Catalonia](#) covers the details.

How to sequence the retrofit of a pre-1980 house

The practical conclusion is not to rush into works before 2030, but to avoid doing them in the wrong order. The directive pushes towards staged renovation, and there is a risk we see often: partial measures that later prevent the next ones from being done properly. Replacing windows without planning how they will meet future facade insulation, or fitting a heat pump sized for a house that leaks heat everywhere, is money that ends up being spent twice.

The sensible order starts with the building envelope: continuous insulation of facades, roof and ground slab, treatment of thermal bridges and airtightness. Then comes mechanical ventilation with heat recovery and, last of all, a heating and cooling system that, with demand already reduced, turns out small. This is the logic of the [EnerPHit standard](#), the Passivhaus version for retrofits, and also that of a good renovation passport: a plan in which each stage prepares the next.

It is not always the answer. When the structure, the layout or the plot make the case, demolishing and rebuilding can work out better, as we discussed in [replace or retrofit](#). In apartment buildings the decision belongs to the owners' association, with its own timelines and grants, which we explain on our [page on retrofitting residential communities](#).

PAPIK Group has been building and retrofitting homes in Catalonia (greater Barcelona area) for thirty years. The directive will not force anyone to carry out works in 2030, but the market has been telling efficient homes apart from inefficient ones for years, and the gap is growing. For owners of a pre-1980 home, the starting point is an [energy assessment of the house](#) that puts the measures in order before any of them is priced.

Frequently asked questions

Does the EPBD require me to retrofit my home before 2030?

No. It requires each member state to cut the average primary energy use of its residential stock, by at least 16% by 2030 against 2020, and to achieve more than half of that reduction through the 43% worst-performing buildings. It sets no works obligation for individual homes.

Will it still be possible to sell or let a flat rated E, F or G?

Yes. The European Commission's Representation in Spain has confirmed that the directive does not restrict sales or rentals based on energy rating. What changes is price: according to the Bank of Spain, a home rated A or B sells on average for 9.7% more than a comparable F or G home.

What is a renovation passport?

A staged roadmap setting out which measures a building needs to reach zero emissions, in what order and with what benefit. Member states had to make it available by 29 May 2026; for owners it is voluntary unless the government decides otherwise.

Can gas boilers still be installed?

Yes, the directive does not ban them. Since 1 January 2025, stand-alone fossil fuel boilers can no longer be subsidised, and national plans must provide for their complete phase-out by 2040 at the latest.

Read also:

[Spain's new building code and whole-life carbon](#)

[EnerPHit, the Passivhaus standard for retrofits](#)

[Next Generation EU retrofit grants in Catalonia](#)

