



CA-EED

Implementation of Art. 6 in the Netherlands

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The Dutch implementation of Article 6 of the EED III





Art. 6 – The renovation target for public bodies



Quick recap

- NL is required to renovate 3% of the total floor area of buildings owned by public bodies each year to Zero Emission Buildings (ZEB)
- The requirement only applies to buildings that are heated and/or cooled and that are larger than 250 m²
- This takes effect on October 11, 2025
- Reference year of the baseline: 01-01-2024

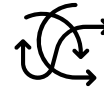


Definition of public bodies



Which entities within the Netherlands fall under the definition of public bodies?

- National, regional or local authorities and entities directly financed and managed by those authorities, which do not have an industrial or commercial character
- This includes: Central government, regional authorities, municipalities, executive agencies, national police, water boards, non-departmental public bodies, umbrella organizations and regional cooperation bodies
- Monuments are included in the inventory, but with less stringent rules. The renovation level to be accomplished will be based on tailored energy advice and judged case by case



Excluded from the inventory:

- Buildings with a residential function
- Buildings that are not warmed or cooled for human occupancy, such as:
 - Buildings with an industrial function
 - Buildings used for storage, garages or technical rooms
- Buildings used solely for religious purposes



Defining the baseline

How much floor area (in m²) is owned by public bodies on 01-01-2024?

- Adjusted for >250m² and the exceptions as mentioned
- Data collected from multiple sources, namely the Key Register of Addresses and Buildings and the database of energy performance certificates

Interesting finds:

- 68% of the total m² is owned by municipalities

Entity	Sector	Amount of buildings	% of total	Floor area in m ²	% of total
Central Government	Ministries (excl. defence)	253	2%	291.597	1%
	Defence	1.188	7%	2.360.419	9%
	Agencies	406	2%	3.481.429	13%
Regional governments	Provinces	186	1%	442.606	2%
Local governments	Municipalities	13.833	83%	18.209.888	68%
	- big (> 50.000 people)	8.430	51%	12.136.313	45%
	- medium (5.000-50.000 people)	5.362	32%	6.044.238	22%
	- small (< 5.000 people)	41	0%	29.337	0%
	Water boards	116	1%	317.470	1%
Entities connected to national authorities	Police	335	2%	1.260.303	5%
Entities connected to regional and local governments	Regional cooperation bodies	349	2%	576.665	2%
	Umbrella organisations	3	0%	14.457	0%
	TOTAL	16.669	100%	26.954.834	100%

Published database is found here → [Gebouwenoverzicht Overheidsinstanties](#)



Yearly target



Calculating the target

- Total m² (26.954.834) needs to be adjusted for the buildings that were already compliant with the renovation obligation on 01-01-2024 (1.272.448 m²) = 25.682.386 m²
- 3% of 25.682.386 = **770.472 m² per year**



How will we track progress?

- Through changes in Energy Performance Certificates
 - EPBDIV - from July 2026: all buildings owned by public bodies need to have an energy label
 - Renovation standard
- Forecasting from subsidy applications
 - How many buildings are expected to go to ZEB in the following years with the help of subsidy schemes?

Renovation Standard

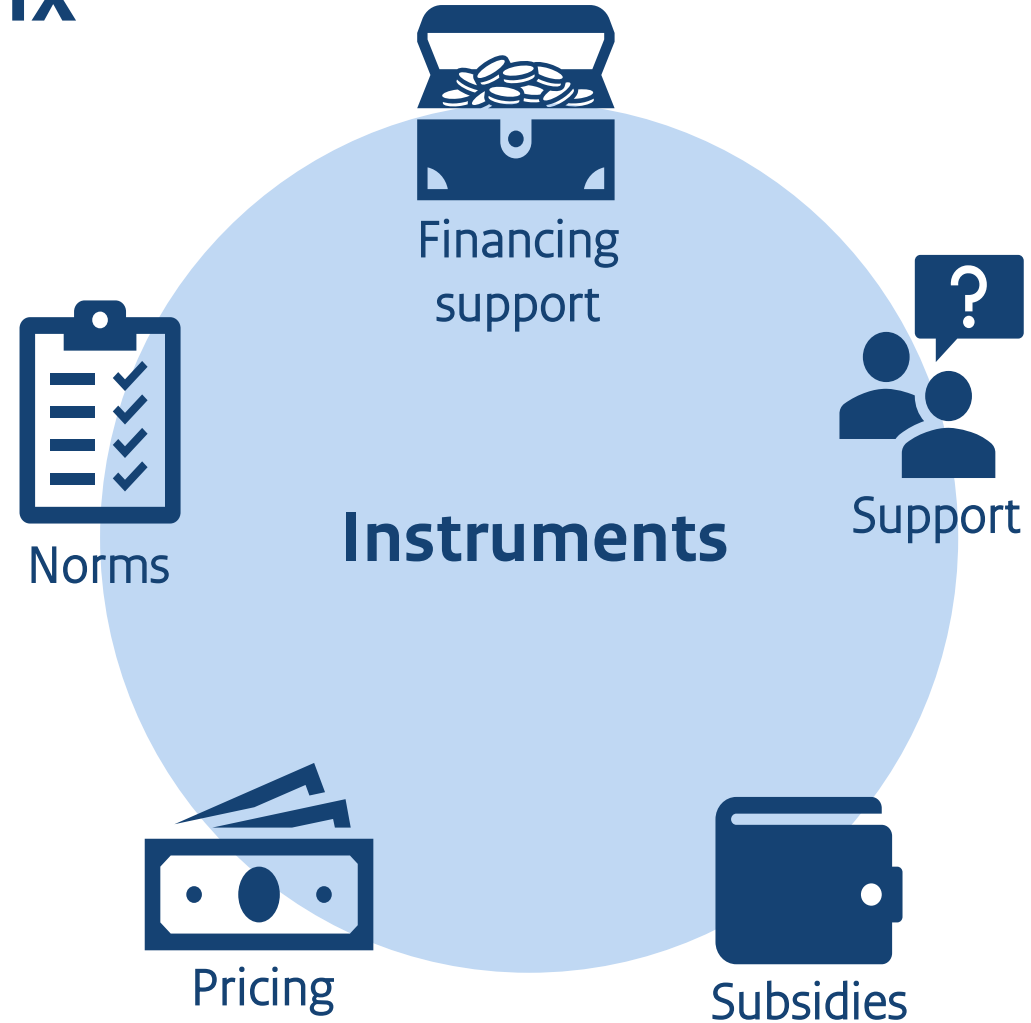
Building category	Label
Meeting	A+++
Prison cel	A++
Healthcare with bed	A++
Healthcare without bed	A+++
Office	A+++
Logies	A++
Eucation	A+++
Sport	A++
Retail	A+++

- Available since 2022
- Voluntary standard (until 2030)
- Very high energy performance, differentiation based on building category
- Preparation for ZEB
 - However: no overcapacity of solar power and must be fossil fuel free

Examples of some instruments



General Policy mix



The DUMAVA - Subsidy for Sustainable Public and societal buildings



Why?

- To encourage owners of existing public real estate to invest in a combination of energy efficiency measures, and/or **to invest in an integrated deep energy renovation project to improve the energy performance of the buildings.**



For whom?

- Local and regional governments
- Regional cooperation bodies (since 2026)
- Monuments (not residential)
- Also available to other institutions that are not part of the definition of Public Bodies.



What?

- Subsidy is requested beforehand and energy advice is mandatory
- Major renovation (or 1, 2, 3 measures)
- For major renovation, public bodies can request up to 30% of the measures or project costs (between €25k - € 1.5 million max.)



How much?

- In total €1.9 billion (available until 2030)
- Started in 2024 and opens yearly
- 25% of yearly budget reserved for major renovations that will lead to the Renovation Standard

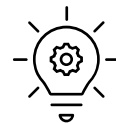


Fund for national government buildings and knowledge programs for municipalities



Fund for renovating buildings of the central government

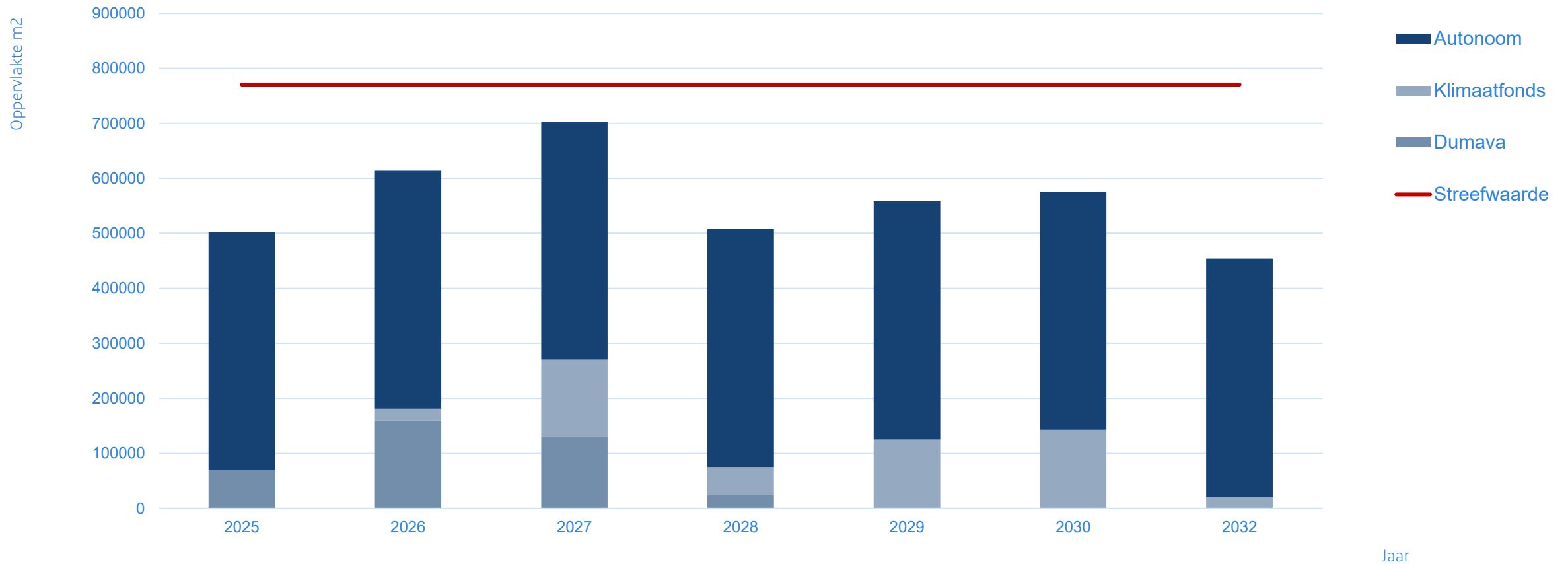
- €370 million available in total
- Renovating buildings from central government agencies to the Renovation standard
- Fund is requested beforehand, application includes extensive renovation plan
- New 'round' in 2026



Renovation program for municipalities

- Buildings owned by municipalities accounts for a significant part of the renovation challenge
- Supporting municipalities not only through financial schemes, but also through knowledge:
- Approach based on deepdiving into one obstacle
- How to do 'this' and how to scale up successful approaches?

Forecast yearly renovation rate with current programs



Convergence with the EPBD IV

Minimal Energy Performance Standard (MEPs)



MEPs

- Interim targets towards ZEB
- Improvement of the 16% worst-performing non-residential buildings in 2030
- Improvement of the 26% worst-performing non-residential buildings in 2033



Implementation in the Netherlands

- All non-residential buildings have to be improved to energy performance certificate D in 2030
- All non-residential buildings have to be improved to energy performance certificate C in 2033
- There will be exceptions, such as monuments, to this requirement

Interesting: Lessons learned from the mandatory energy performance certificate C requirement for offices indicate that it serves as an incentive for owners to aim for high-quality renovations, reaching Label A or beyond.

Influence of MEPs

Entiteit	type instantie / 'sector'	Floor area in m2 for buildings >250 m2 following the definition of public bodies	label A+++ or higher	MEPS 2033									no Energy Performance Certificate
				label A++	label A+	label A	label B	label C	label D	label E	label F	label G	
Central Government	- Ministries (excl. Defence)	291.597	4.486	19.160	12.632	26.985	4.572	7.324	14.382	1.447	10.826	12.033	177.750
	- Defence	2.360.419	39.932	32.246	4.241	129.764	15.445	26.814	7.733	6.059	18.967	19.465	2.059.753
	- Agencies (excl. Defense)	3.481.429	305.955	372.750	109.884	749.533	606.240	520.785	104.266	59.856	2.691	117.903	531.566
Regional governments	- Provinces	442.606	51.817	73.441	6.071	59.060	1.364	33.883	7.689	3.831	0	16.358	189.092
Local governments	- Municipalities	18.209.888	1.069.241	672.127	863.265	3.270.004	981.327	1.088.761	635.859	474.586	342.454	1.027.820	7.784.444
	- big (> 50.000 residents)	12.136.313	801.459	454.200	509.121	2.192.573	681.793	691.228	436.406	319.533	250.943	520.158	4.957.454
	- medium (5.000-50.000 residents)	6.044.238	267.669	213.488	353.581	1.073.216	299.534	397.236	197.158	193.993	82.163	207.512	1.799.286
	- small (< 5.000 residents)	29.337	113	4.439	563	4.215	0	297	296	2.252	326	124	27.892
	- Water boards	317.470	8.753	38.099	12.129	79.306	13.631	4.446	0	2.473	0	149	158.484
Entities connected to national authorities	- Police	1.260.303	40.331	4.712	59.854	432.144	210.570	219.072	25.862	48.027	21.592	115.353	82.786
Entities connected to regional and local governments	- Regional cooperation bodies	576.665	62.741	23.928	28.043	116.351	19.878	56.188	5.322	6.266	13.481	2.983	241.484
	- Umbrella organisations	14.457	0	0	0	13.178	0	0	0	1.279	0	0	0
TOTAL		26.954.834	1.583.256	1.236.463	1.096.119	4.876.325	1.853.027	1.957.273	801.113	603.824	410.011	1.312.064	11.225.359

- 2030 Energy Performance Certificates EFG to minimum of label D – 2.325.899 m²
- 2033 minimum label C – 801.113 m²
- Expectation: some will go directly to the Renovation Standard



Questions?

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