

Preparedness for EPBD Implementation through National Workshops and Stakeholder Engagement in Six EU Member States

BRIEF 2 – GREECE

Legislative and Policy Landscape for Energy Renovation in Greece

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1. Executive Summary

This policy brief outlines the current legislative and strategic framework for building renovation in Greece, with particular emphasis on the implementation of the Energy Performance of Buildings Directive (EPBD Recast, EU 2024/1275) and the path toward introducing Minimum Energy Performance Standards (MEPS). It reviews the national policy architecture, evaluates key financial and technical tools, and identifies critical implementation barriers.

Over the last decade, Greece has taken significant legislative steps to align with European climate and energy objectives. Updates to KENAK and recent revisions of the National Energy and Climate Plan (NECP 2024) signal increasing policy ambition. These efforts are further supported by the National Renovation Strategy (NRS), various EU-funded programmes, and the growing presence of One-Stop Shops and Energy Service Companies (ESCOs).

Despite these advances, implementation remains uneven. Key challenges include the dispersion of institutional responsibilities, delays in administrative procedures, funding absorption bottlenecks, and insufficient technical capacity at the local level. The brief concludes with targeted recommendations to enhance governance, simplify access to financing, improve data monitoring, and ensure social equity throughout the energy renovation process.

2. EU Context: The EPBD and Renovation Wave

The Energy Performance of Buildings Directive (EPBD), initially introduced in 2002 and most recently revised in 2024 (Directive (EU) 2024/1275), is the central legal framework governing energy efficiency in the EU's building sector. The Directive has evolved into a comprehensive policy tool that not only regulates minimum energy performance for new constructions and major renovations but also establishes mechanisms such as Energy Performance Certificates (EPCs), Smart Readiness Indicators (SRIs), and the progressive deployment of Building Renovation Passports.

As part of the European Green Deal, the Renovation Wave strategy aims to double at least the annual rate of energy renovations in the EU by 2030, with a strong focus on improving the worst-performing buildings. This is essential to achieving the Union's climate neutrality objective by 2050 and to alleviating energy poverty. The EPBD Recast strengthens this ambition by requiring Member States to define Minimum Energy Performance Standards (MEPS) for the residential sector, setting national renovation trajectories, and improving the reliability and comparability of EPCs across the EU.

Under the new directive, Member States must ensure that all new buildings are zero-emission by 2030, and that the worst-performing residential buildings are progressively renovated by 2033. The Directive also calls for the integration of whole-life carbon metrics, energy system flexibility, and renewable readiness in building stock assessments. These developments establish a clear roadmap for national governments, including Greece, to define cost-effective and socially inclusive renovation pathways, supported by transparent regulatory frameworks and funding instruments.

3. National Legislative Framework in Greece

3.1 Primary Legislation

The core legal instrument regulating energy performance in buildings in Greece is the Regulation on the Energy Performance of Buildings (Κανονισμός Ενεργειακής Απόδοσης Κτιρίων – KENAK), which was first introduced by Presidential Decree 100/2010 in alignment with Directive 2002/91/EC. KENAK establishes minimum energy performance requirements for new buildings and major renovations, providing the methodology for calculating energy consumption, issuing Energy Performance Certificates (EPCs), and defining building classifications (ranging from A+ to H).

KENAK was last revised in 2017 to reflect developments under Directive 2010/31/EU, and further technical adjustments have been issued through Ministerial Decisions by the Ministry of Environment and Energy. These updates address thermal insulation standards, HVAC system performance, and the integration of renewable energy sources in buildings.

Despite these efforts, complete transposition of the 2024 EPBD Recast (Directive (EU) 2024/1275) remains pending. Greece is expected to revise KENAK in 2025 to incorporate the new MEPS framework, whole-life carbon considerations, and updated provisions for Building Renovation Passports. Additionally, a new law is anticipated to define the institutional and procedural mechanisms for the gradual implementation of MEPS in the residential sector. These upcoming reforms will be critical to aligning Greece's legislative framework with EU targets and ensuring policy coherence across national and regional levels.

3.2 Institutional Actors

The Ministry of Environment and Energy (ΥΠΕΝ) serves as the principal authority responsible for energy renovation policy in Greece. It is tasked with designing and transposing EU legislation (including the EPBD), updating the National Energy and Climate Plan (NECP), and formulating technical standards and guidelines under KENAK. Within the Ministry, the Directorate for Buildings and Energy Efficiency leads the development of building-related policy instruments and oversees coordination with national stakeholders and EU institutions.

Implementation support is provided by the Technical Chamber of Greece (TEE), which manages the software and databases for Energy Performance Certificates (EPCs), maintains the registry of certified energy auditors, and provides professional training. The Ministry of Development and Investments manages funding allocation through EU Structural and Recovery Funds, while the Hellenic Statistical Authority (ELSTAT) contributes to energy data reporting and compliance monitoring.

The Regulatory Authority for Waste, Energy and Water (RAAEY), formerly known as RAE, plays an emerging role in monitoring energy efficiency obligations and guiding regulatory adjustments that affect the building sector, particularly in relation to the integration of renewable energy systems. Local authorities also bear partial responsibility for implementation, especially in social housing and municipal buildings, but often lack the technical and administrative capacity required to deliver large-scale renovation programmes.

While responsibilities are distributed across multiple actors, the absence of a centralised coordination mechanism remains a barrier to coherent and timely implementation. Strengthening inter-ministerial governance, clarifying mandates, and reinforcing local capacities will be key to accelerating progress under the revised EPBD framework.

4. Key National Strategies and Plans

The cornerstone of Greece's national climate and energy policy is the **National Energy and Climate Plan (NECP)**, originally submitted in 2019 and most recently updated in 2023 to reflect the EU's Fit-for-55 legislative package and the RePowerEU strategy. The NECP sets binding national targets for reducing greenhouse gas emissions, enhancing energy efficiency, and increasing the share of renewable energy by 2030. In the building sector, specifically, the revised NECP calls for a 38% reduction in final energy consumption and significant reductions in emissions compared to 2005 levels. These targets are to be achieved through scaled-up renovation programmes, new financial instruments, and strengthened regulatory frameworks aligned with the EPBD Recast.

Complementing the NECP is Greece's **Long-Term Renovation Strategy (LTRS)**, developed under Article 2a of the EPBD. The LTRS outlines a pathway to achieving a highly energy-efficient and decarbonised building stock by 2050, with intermediate milestones set for 2030 and 2040. It identifies the most energy-wasteful segments of the building stock and proposes staged interventions, with a focus on vulnerable households, public buildings, and multi-family housing.

While both strategies represent progress in terms of planning, their operationalisation remains challenging. The NECP lacks binding sectoral budgets or enforceable renovation obligations, and coordination between the LTRS and funding programmes is limited. The forthcoming transposition of the EPBD Recast presents an opportunity to update both strategies, integrate MEPS trajectories, and introduce concrete accountability mechanisms to ensure progress toward climate neutrality in the building sector.

A successful policy architecture will require complete alignment between the NECP, the LTRS, KENAK revisions, and newly developed tools such as Renovation Passports and Digital Building Logbooks. Ensuring policy coherence across these instruments is vital for delivering measurable results.

5. Supporting Financial Instruments

Greece utilises a range of financial instruments to support the renovation of its building stock, leveraging both EU and national resources. The flagship “**Exoikonomo**” programme, launched in 2011 and expanded in subsequent cycles, remains the central vehicle for financing energy efficiency improvements in residential buildings. Through a mix of grants and subsidised loans, it supports interventions such as thermal insulation, window replacements, and upgrades to heating and cooling systems. The programme is funded primarily through the **European Regional Development Fund (ERDF)** and national co-financing mechanisms, with additional contributions from private banks.

In addition to “Exoikonomo”, significant resources have been mobilised through the **Recovery and Resilience Facility (RRF)** under Greece’s “Greece 2.0” plan. The RRF allocates over €1.3 billion for building upgrades, including energy renovation of public buildings (notably schools and hospitals), the development of one-stop shops, and pilot programmes for social housing. Structural and Cohesion Funds under the 2021–2027 Multiannual Financial Framework (MFF) further complement these efforts, particularly in supporting municipalities and regional authorities.

Despite these financial commitments, **access to funding remains uneven**. Administrative complexity, limited awareness, and high co-financing requirements create entry barriers, particularly for low-income households, small enterprises, and vulnerable groups such as the elderly or renters. In rural and island areas, where the need for renovation is often greatest, uptake remains relatively low due to a lack of advisory support and difficulties in securing private financing.

To address these challenges, Greece is piloting **innovative financial instruments**, including revolving loan funds, on-bill repayment schemes, and energy performance contracting through Energy Service Companies (ESCOs). These tools have the potential to reduce upfront costs, improve affordability, and enhance private sector participation. However, their deployment remains limited in scale.

Maximising the impact of financial instruments will require greater integration with policy objectives, simplification of procedures, and tailored support for underrepresented segments. Enhanced coordination between managing authorities, banks, municipalities, and civil society organisations will be essential to ensure inclusive and effective funding distribution.

6. Achievements and Progress

In recent years, Greece has made tangible progress in the area of building renovation, both in terms of policy development and practical implementation. The **2017 update of KENAK aligned national technical standards with EU requirements, strengthening provisions for insulation, energy systems, and the** integration of renewables. Additionally, the **mandatory issuance of Energy Performance Certificates (EPCs)** for all property transactions and major renovations has created a basic national database on the energy performance of the building stock, despite gaps in data consistency and enforcement.

The successive rounds of the **“Exoikonomo” programme** have supported the energy renovation of over **200,000 dwellings**, leading to an average **primary energy reduction of approximately 45% per building**. The latest rounds have introduced income-based prioritisation criteria, aiming to improve social targeting. However, the majority of renovated homes remain in the middle-to-upper EPC classes, with limited penetration among the worst-performing buildings.

While these developments mark a positive trajectory, Greece has not yet achieved a comprehensive renovation framework with clearly defined MEPS trajectories and enforceable targets. The implementation of the EPBD Recast will be critical for consolidating these gains and addressing remaining structural gaps.

7. Outstanding Barriers

Category	Barrier	Illustration
Administrative	Complex approval procedures	Long delays in RRF fund disbursement
Financial	Limited SME access to credit	High collateral requirements for small contractors
Technical	Shortage of qualified auditors and installers	Concentrated in urban centres
Social	Low awareness and high co-financing requirements	Exclusion of vulnerable households
Data Monitoring	Incomplete tracking of actual savings	Weak integration of EPC data with policy databases

8. Opportunities and Recommendations

The forthcoming transposition of the EPBD Recast provides Greece with a unique opportunity to strengthen the foundation of its building renovation framework and accelerate its transition toward a zero-emission building stock. A top priority is the timely revision of KENAK to reflect the updated minimum energy performance thresholds and incorporate clear, enforceable **Minimum Energy Performance Standards (MEPS)**. These standards should be progressive, socially inclusive, and accompanied by supporting measures that reflect the country's building typology and socioeconomic conditions.

At the strategic level, there is an urgent need to ensure complete alignment between the **NECP**, the **Long-Term Renovation Strategy**, and the range of funding mechanisms currently in use. A harmonised and integrated approach would enable more coherent policy design and better use of financial resources, especially when linking renovation targets with emission reductions and climate adaptation goals. Developing a national renovation trajectory with intermediate milestones and public reporting requirements would help monitor progress and increase accountability.

The expansion of **One-Stop Shops** and local energy advisory services presents a key opportunity to bridge the gap between policy intent and implementation. These structures should be institutionalised at the municipal and regional levels, with adequate staffing, digital tools, and coordination with funding agencies. Their presence is especially critical in reaching vulnerable households and remote communities that currently struggle to access support schemes.

Improving the **social targeting** of funding programmes is also essential. Eligibility criteria should prioritise households in energy poverty, renters in substandard dwellings, and regions with documented vulnerabilities. At the same time, application procedures must be streamlined and digitalised to reduce bureaucratic complexity and increase uptake among marginalised groups.

Ultimately, the reinforcement of monitoring and reporting systems is a crucial prerequisite for policy success. Data collection on building stock, energy performance, and renovation outcomes should be centralised, standardised, and made interoperable with EU-level systems. Strengthening the capacity of national institutions, including the Ministry of Environment and Energy and the Technical Chamber of Greece, will ensure that renovation policies are based on reliable evidence and continuously improved through feedback mechanisms.

9. Conclusion

Greece stands at a critical juncture in the transformation of its building sector. Over the past decade, it has built the foundational policy, legal, and financial structures necessary to support large-scale energy renovations. However, the transition from framework design to effective delivery remains incomplete. Implementation gaps, fragmented responsibilities, and challenges in reaching vulnerable populations continue to limit the overall impact of national efforts.

The 2024 revision of the Energy Performance of Buildings Directive introduces clear expectations for Member States to accelerate renovation, adopt Minimum Energy Performance Standards, and ensure that no citizen is left behind in the transition. For Greece, this represents both a challenge and an opportunity. Addressing the structural barriers identified in this brief—governance fragmentation, financial access, and weak institutional coordination—will be essential to unlocking the full potential of renovation as a driver of decarbonisation, social inclusion, and economic resilience.

Meeting the EPBD's ambition will require a renewed focus on integrating strategies, investing in delivery infrastructure such as One-Stop Shops, and embedding social equity into every layer of the renovation framework. With political will, technical alignment, and sustained stakeholder engagement, Greece can move from incremental change to systemic transformation in the building sector, ensuring that energy renovation delivers both climate benefits and meaningful improvements in people's lives.