



Delivering on the European
Green Deal and Fit for 55

Energy Performance of Buildings Directive (EPBD)

Life-cycle Global Warming Potential

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Summarise of the provisions on Global Warming Potential

- Article 7(2) : Calculation of LC Global Warming Potential (GWP) from 1-01-2028 for large new buildings & from 01-01-2030 for all new buildings
 - Article 7(3) Calculation in accordance with the main principles of Annex III, pending the adoption of a DA to set out a Union framework for the national calculation of GWP by 31 December 2025
- Article 7(5) : By 01-01-2027, publication & notification of national roadmaps detailing introduction of limit values and set targets

Timeline of the provisions for Life-cycle GWP

May 2024

Publication of the EPBD in the OJ & entry into force
[Directive - EU - 2024/1275 - EN - EUR-Lex \(europa.eu\)](#)

January 2027

Member States shall publish and notify to the Commission a roadmap on the introduction of limit values & targets
Article 7(5)

January 2030

> All new buildings

Member States shall ensure that life-cycle GWP is calculated in accordance with Annex III (and DA) and disclosed in the energy performance certificate
+ **limit values** for all new buildings from national roadmaps
Article 7(2) + Article 7(5)

31 December 2025

The Commission shall adopt a delegated act setting out a Union framework for the national calculation of life-cycle GWP.
Article 7(3)

January 2028

> New buildings over 1000m² useful floor area

Member States shall ensure that life-cycle GWP is calculated in accordance with Annex III and disclosed in the energy performance certificate.
Article 7(2)

Process

What has been done so far

- **October 2024 : Stakeholder meeting**
- December 2024 : EPB meeting with MS
- February 2025 : EPB Discussion with MS

Today's meeting : 2nd stakeholder meeting

- Survey sent you prior to the meeting
- Response to survey or other input before **6 Marche 2025 COB**

Process

What's next

- Adjustment and validations

Delegated act

- ~June 2025 : Launch “Have your say”
- Opinion of the expert group & Finetuning
- Translation & Validations
- Adoption : **before December 2025**

Guidance

- Translations & Validations
- Adoption : ~ **Mid 2025**



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Energy Performance of Buildings Directive (EPBD)

**First draft of the delegated act setting out a Union
framework for the national calculation of life-cycle GWP**

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➤ Article 7(3) Calculation in accordance with the main principles of Annex III, pending the adoption of a DA to set out a Union framework for the national calculation of GWP by 31 December 2025

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Article 7(2)

Provisions of the recast EPBD for Life-cycle GWP

Article 7(2)

Member States shall ensure that the life-cycle GWP is calculated in accordance with **Annex III** and disclosed in the energy performance certificate of the building:

- (a) from 1 January 2028, for all new buildings with a useful floor area larger than 1000 m²;
- (b) from 1 January 2030, for all new buildings.

Article 7(3)

The Commission is empowered to adopt **delegated acts** in accordance with Article 32 to **amend Annex III** to **set out a Union framework for the national calculation** of life-cycle GWP with a view to achieving climate neutrality. The first such delegated act shall be adopted by 31 December 2025.

Provisions of the recast EPBD for Life-cycle GWP

Annex III

For the calculation of the life-cycle GWP of new buildings pursuant to Article 7(2), the **total life-cycle GWP** is communicated as a numeric indicator **for each life-cycle stage** expressed as **kgCO₂eq/(m²)** (of useful floor area) calculated over a reference **study period of 50 years**. The data selection, scenario definition and calculations shall be carried out in accordance with EN 15978 (EN 15978:2011 Sustainability of construction works. Assessment of environmental performance of buildings. Calculation method) and taking into account any subsequent standard relating to the sustainability of construction works and the calculation method for the assessment of environmental performance of buildings. The **scope of building elements** and technical equipment is as defined in the Level(s) common EU framework for indicator 1.2. Where a national calculation tool or method exists, or is required for making disclosures or for obtaining building permits, that tool or method may be used to provide the required disclosure. Other calculation tools or methods may be used if they fulfil the minimum criteria established by the Level(s) common EU framework. **Data regarding specific construction products** calculated in accordance with Regulation (EU) No 305/2011 of the European Parliament and of the Council (1) shall be used when available.

Consideration for the delegated Act

1. General consideration for the Union framework
2. Scope of Life Cycle Modules
3. Scope of building components
4. Reference Study period
5. Life-cycle GWP calculation
6. Data regarding construction products
7. Useful floor area
8. Reporting format

General consideration for the Union framework

Annex III

[...] Where a national calculation tool or method exists, or is required for making disclosures or for obtaining building permits, that tool or method may be used to provide the required disclosure. Other calculation tools or methods may be used if they fulfil the minimum criteria established by the Level(s) common EU framework. [...]

- Stakeholders call for harmonization of life-cycle GWP : comparability of results, common methodology and set of rules, consistency and equal treatment.
- The Union framework should offer some level of adaptability including frontrunner Member States to facilitate the transition.
- The Union framework should be built upon internationally recognized standards and existing framework including Level(s).
- The Union framework for life-cycle GWP assessment should be built **based on the standard EN 15978**.

Life cycle GWP calculation

Life cycle GWP
at product level



Quantity



Life cycle GWP
at building level

Available prior to the calculation :

- CPR, etc
- Generic data, etc

Example :

- 1 unity of window
- 1 m3 of Cross-Laminated Timber



Production stage (A1-A3)	Construction process (A4-A5)	Use (B1)	Maintenance (B2)	...	End of life (C)	Benefits and loads beyond the system boundary (D)
-492 kgCO ₂ eq.	91 kgCO ₂ eq.	0	0	...	737 kgCO ₂ eq.	-221 kgCO ₂ eq.

Example of 1 m³ of wood (source INIES)

Life cycle GWP calculation



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Example of 1 m³ of wood (source INIES)

Data regarding construction products

Type of data
Product-specific data issued from Regulation (EU) 2024/3110 (previously Regulation (EU) No 305/2011)
Data regarding specific products calculated in accordance with product regulation derived from Directive 2009/125/EC, Regulation (EU) 2024/1781 and/or from Regulation (EU) /2017/1369
Project-specific data in accordance with EN15804
Product-specific data in accordance with EN15804
Average data for a product group in accordance with EN15804
Generic data
Default values

Scope of Life Cycle Modules

Article 2(25)

‘life-cycle GWP’ means an indicator which quantifies the global warming potential contributions of a building along its **full life cycle**.

Article 2(24)

‘whole-life-cycle greenhouse gas emissions’ means greenhouse gas emissions that occur over the whole life cycle of a building, including the **production and transport of construction products, construction-site activities, the use of energy in the building and replacement of construction products**, as well as **demolition, transport and management of waste materials and their reuse, recycling and final disposal**;

Scope of Life Cycle Modules

Annex III

For the calculation of the life-cycle GWP of new buildings pursuant to Article 7(2), the total life-cycle GWP is communicated as a numeric indicator for **each** life-cycle stage expressed as kgCO₂eq/(m²) [...]

- New CPR → mandatory GWP calculation for construction product
- GWP calculation at building level → same required life cycle stage
 - No extra burden for manufacturer to create additional data
 - Make construction product environmental data declaration meaningful
 - Put forward the best solution for the same service to a building rather than comparison at product level

Scope of Life Cycle Modules

BUILDING LIFE CYCLE INFORMATION

ADDITIONAL INFORMATION BEYOND THE BUILDING LIFE CYCLE

A0 Pre-construction	A1-A3 Product stage			A4-A5 Construction stage		B1-B8 Use stage					C1-C4 End of life stage				D Benefits and loads beyond the system boundary	
<p>A0</p> <p>Assessment of non-physical activities (design and decision-making, preliminary studies acquisition of land/site etc.)</p>	A1 Extraction and upstream production	A2 Transport to factory	A3 Manufacturing	A4 Transport to site	A5 Construction: Installation process including site clearance, preparation	B1 Use	B2 Maintenance	B3 Repair	B4 Replacement of Building components	B5 Refurbishment	C1-C4 Deconstruction/Demolition Transport to waste processing or disposal Waste processing for reuse, recovery and/or recycling Disposal of waste				D1 Potential net benefits from reuse, recycling Energy recovery and/or other recovery	D2 Potential benefits and loads from exported Utilities (e.g. electrical energy, Thermal Energy, potable water)
	B6 Operational energy use					B7 Operational water use					B8 Building related users' activities not covered in B1-B7					

Mandatory Minimum harmonized framework

Scope of Life Cycle Modules

- With some considerations, e.g.
 - B1 : only fugitive emissions of refrigerants from building-integrated technical systems.
 - B6 : already calculated already as part of the national methodology for EPCs.
 - A5 : site preparation, but not demolition of existing structures.
 - B7 : optional, if done -> a separate indicator
- The data available in accordance with Construction Product Regulation must be used when available.
- MS (or groups of MS) define generic and default data to be used when more specific data or calculation is unavailable:
 - Ex : a generic data for a life cycle module/product/group of products/activities

Allocation of embodied emissions of building's energy generating unit/system(s)

- MS choose an appropriate approach at the national level regarding the embodied carbon of building's energy generating unit/system(s) :

Aspect / Influencing factor	Approach A	Approach B	
Type of allocation of embodied emissions to the building of energy storage components	Full allocation to the building		
Type of allocation of embodied emissions to the building of other system parts	Full allocation to the building	B1: Proportional allocation to the building based on the share of captured/generated energy used for self-consumption	B2: Allocation to the building for components integrated into the building envelope and forming its surface, as well as proportional allocation of the remaining embodied emissions to the building based on the share of captured/generated energy used for self-consumption

Scope of building elements

Annex III

The scope of building elements and technical equipment is as defined in the Level(s) common EU framework for indicator 1.2.

- The delegated act should establish a common scope of building elements **for transparency and consistency** in life-cycle GWP calculations, **while considering balance** to be established regarding the **appropriate granularity**
 - It's practically impossible to list each and every component of building
 - However, if no reference, it can create discrepancy and unfair perception, as those who conduct more detailed calculations may show higher impacts.
- The table of building elements discussed with colleagues in charge of Levels and based on the International Cost Management Standard (ICMS – 3)

Scope of building elements

Tier 1	Tier 2	Tier 3	Tier 4 - Examples
Shell	substructure	Foundation piling and underpiling	<i>Permanent piles and caisson;</i>
			<i>Pile and caisson testing;</i>
			<i>Underpinning.</i>
		Foundation up to top of lowest floor slabs	<i>Excavation and disposal;</i>
			<i>Lateral supports;</i>
			<i>Raft footings, pile caps, column bases, wall footings; strap beams, tie beams;</i>
			<i>Substructure walls and columns;</i>
			<i>Lowest floor slabs and beams (excluding and beyond basement bottom slabs);</i>
<i>Lift pits;</i>			
<i>Composite or prefabricated work.</i>			
...

- Union framework set out minimum requirement → Tier 3
 - Tier 4 is given only as examples : MS chose their appropriate list
- External works (e.g. roads and paving, site enclosure, etc) : excluded
- Parking facilities related to building use but are independent of building structure : included (happy to receive your feedback)

Reference Study period

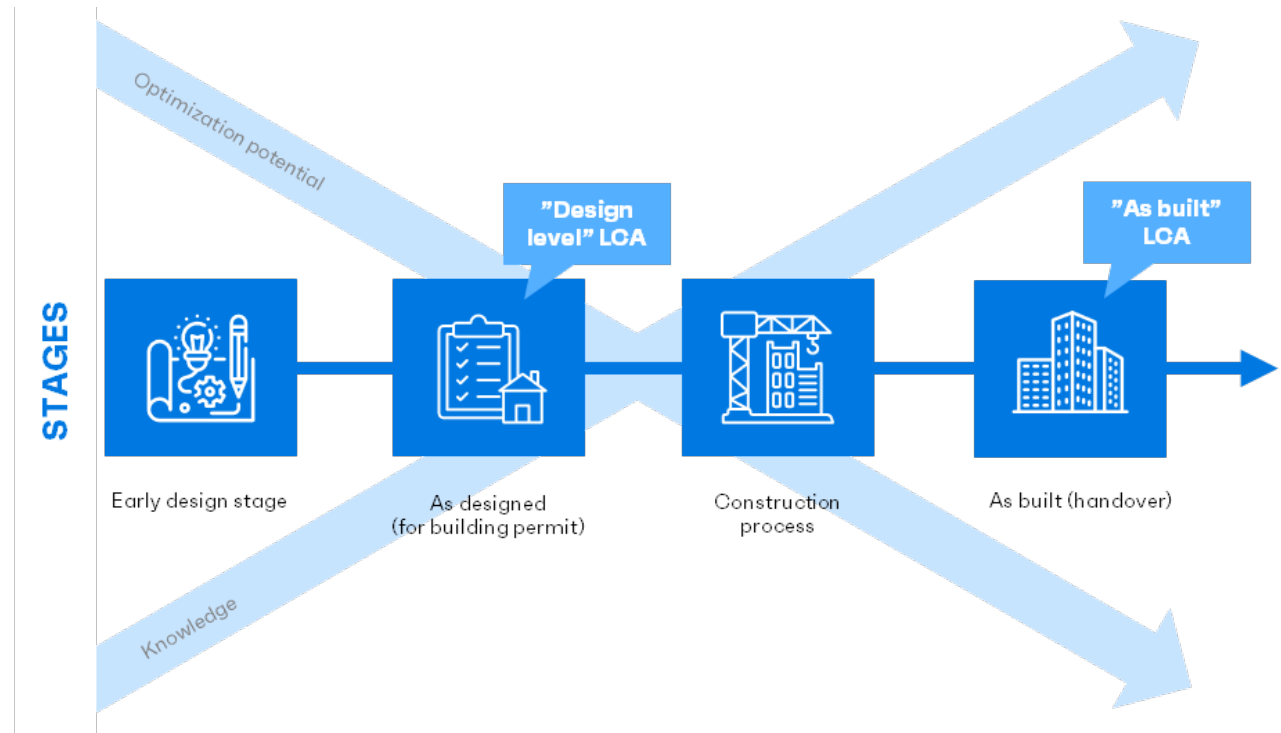
Annex III

For the calculation of the life-cycle GWP of new buildings pursuant to Article 7(2), the total life-cycle GWP is communicated as a numeric indicator for each life-cycle stage expressed as kgCO₂eq/(m²) (of useful floor area) calculated over a **reference study period of 50 years**.

- The Reference Study Period (RSP) is an assumption for the calculation.
- The Reference Study Period doesn't necessarily reflect the reality as the building can be used longer than 50 years with or without a significant renovation or may in the end be used for a shorter period of time, even if this was not foreseen initially.
- Considered the Levels framework, the standards and many of the MS existing legislation, the **Reference Study Period is 50 years**.

When to do the life-cycle GWP calculation

The aim of the recast EPBD is to encourage better design and better choices of materials



- The life-cycle GWP should be calculated (or rather estimated) at design stage and confirmed at as-built stage.
- If needed, simplify calculation at “as-designed” stage with generic data and default values

Useful floor area

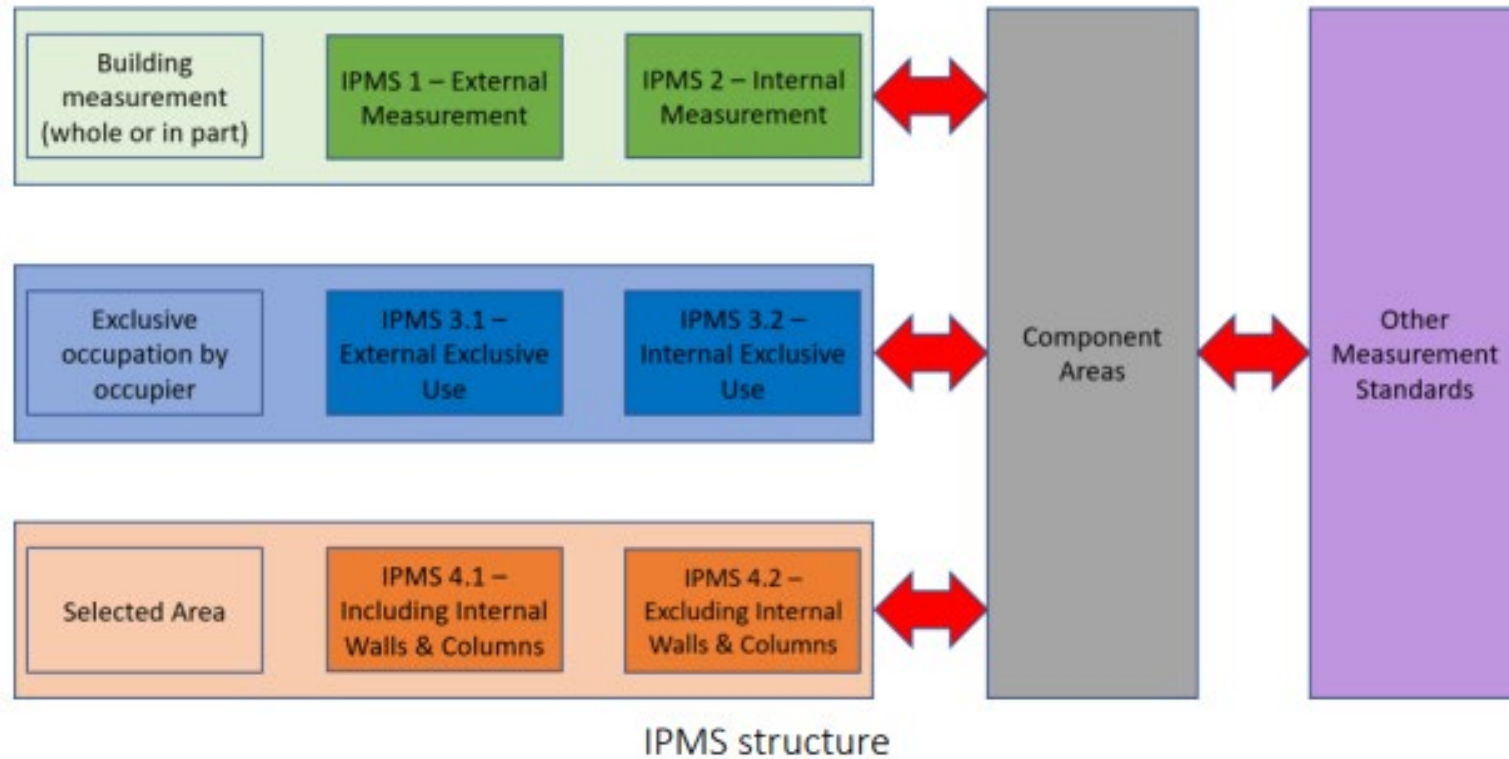
Article 2(51)

‘useful floor area’ means the area of the floor of a building needed as parameter to quantify specific conditions of use that are expressed per unit of floor area and for the application of the simplifications and the zoning and allocation or re-allocation rules;

- MS shall clearly define the definition of the useful floor area at national level.
 - The useful floor area shall correspond to the area of the parts of the building that are covered by the life-cycle GWP calculation and shall not extend beyond the building envelope.
- For transparency and consistency, MS shall describe at the national level the floor areas used in terms of International Property Measurement Standards (IPMS) component areas

Useful floor area

Definition of useful floor area according to IPMS (2023)



Reporting of results

Mandatory reporting in EPC for new construction according to Article 7(2) and Annex V :

	Production Stage (A1-A3)	Construction Process Stage (A4-A5)	Use, Maintenance, Replacement Stage (B1, B2, B4)	Operational energy use Stage (B6)	End of life stage (C1-C4)	Benefits and loads beyond the system boundary including Reuse, Recycling, Energy recovery (D1-D2)
GWP-total						



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Guidance on the life-cycle Global Warming Potential of new buildings (Article 7(2), (5) of the recast Energy Performance of Buildings Directive)

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Interpretation of Article 7(2)

Article 7(2)

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- (a) from 1 January 2028, for all new buildings with a useful floor area larger than 1000 m²;
- (b) from 1 January 2030, for all new buildings.

Calculation of the life-cycle GWP accordance with Annex III

From 1 January 2028, for all new buildings with a useful floor area larger than 1000 m²; and from 1 January 2030, for all new buildings.

Member States may exempt the obligation of GWP calculation for new buildings if it is in a category of buildings for which they decide not to require to have an EPC, as permitted by Article 20(6).

Interpretation of Article 7(2)

Article 20(6)

MS may exclude from having EPC issue the categories of building :

- buildings used as places of worship and for religious activities;
- temporary buildings with a time of use of two years or less, industrial sites, workshops and non-residential agricultural buildings with low energy demand and non-residential agricultural buildings which are used by a sector covered by a national sectoral agreement on energy performance;
- stand-alone buildings with a total useful floor area of less than 50 m².

MS which chose to exclude from the obligations of this Article by 28 May 2024, residential buildings which are used or intended to be used for either less than four months of the year or, alternatively, for a limited annual time of use and with an expected energy consumption of less than 25 % of what would be the result of all-year use, may continue to do so.

Interpretation of Article 7(2)

Article 7 mention only the exception in Article 7(4)

Article 7(4)

Member States may decide not to apply paragraphs 1 and 2 to buildings for which building permit applications or equivalent applications, including for change of use, have already been submitted by the dates pursuant to paragraphs 1 and 2.

Other possible exceptions -> Article 7(4) : “Member States may decide not to apply paragraphs 1 and 2 to buildings for which building permit applications or equivalent applications, including for change of use, have already been submitted by the dates pursuant to paragraphs 1 and 2.”.

Article 2(1) provides the definition of “building” :

‘building’ means a roofed construction having walls, for which energy is used to condition the indoor environment;

Provisions of the recast EPBD for Life-cycle GWP

Article 7(5)

By 1 January 2027, Member States shall publish and notify to the Commission a roadmap detailing the introduction of limit values on the total cumulative life-cycle GWP of all new buildings and set targets for new buildings from 2030, considering a progressive downward trend, as well as maximum limit values, detailed for different climatic zones and building typologies.

Those maximum limit values shall be in line with the Union's objective of achieving climate neutrality.

The **Commission shall issue guidance**, share evidence on existing national policies and offer technical support to Member States, at their request.

Structure of the draft guidance document

1. Introduction
2. Summary of the legal provisions
3. Guidance on implementation of the legal provisions
4. Recommended process to establish the national roadmap
5. Recommended timeline
6. Common roadmap template

Provisions of Article 7(5)

Article 7(5)

By 1 January 2027, Member States shall publish and notify to the Commission a **roadmap** detailing the introduction of limit values on the total cumulative life-cycle GWP of all new buildings and **set targets for new buildings from 2030**, considering a progressive downward trend, as well as maximum limit values, detailed for different climatic zones and building typologies.

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Provisions of Article 7(5)

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- Member States publish and notify a roadmap detailing the introduction of **limit values**, from 2030.

Provisions of Article 7(5)

Article 7(5)

[...] roadmap detailing the introduction of limit values on the total cumulative life-cycle GWP of all new buildings and set targets for new buildings from 2030 [...]

- Delegated act adopted by 31 December 2025.
- Roadmap published by 1 January 2027.
 - Actual numerical value of the limit values or details on how the limit values will be introduced and the ambitions.
- Actual numerical limit : can be defined later in the national regulation the earliest possible so that they are in force no later than 1 January 2030.

Provisions of Article 7(5)

Article 7(5)

[...] set targets for new buildings from 2030, considering a progressive **downward trend**
[...]

- A series of limit values from 2030 with **downward trend**, example : a limit value in 2030 followed by a lower value in 2033, in 2036, etc.
- MS decides on the interval, typically every 3 or 5 years.

Provisions of Article 7(5)

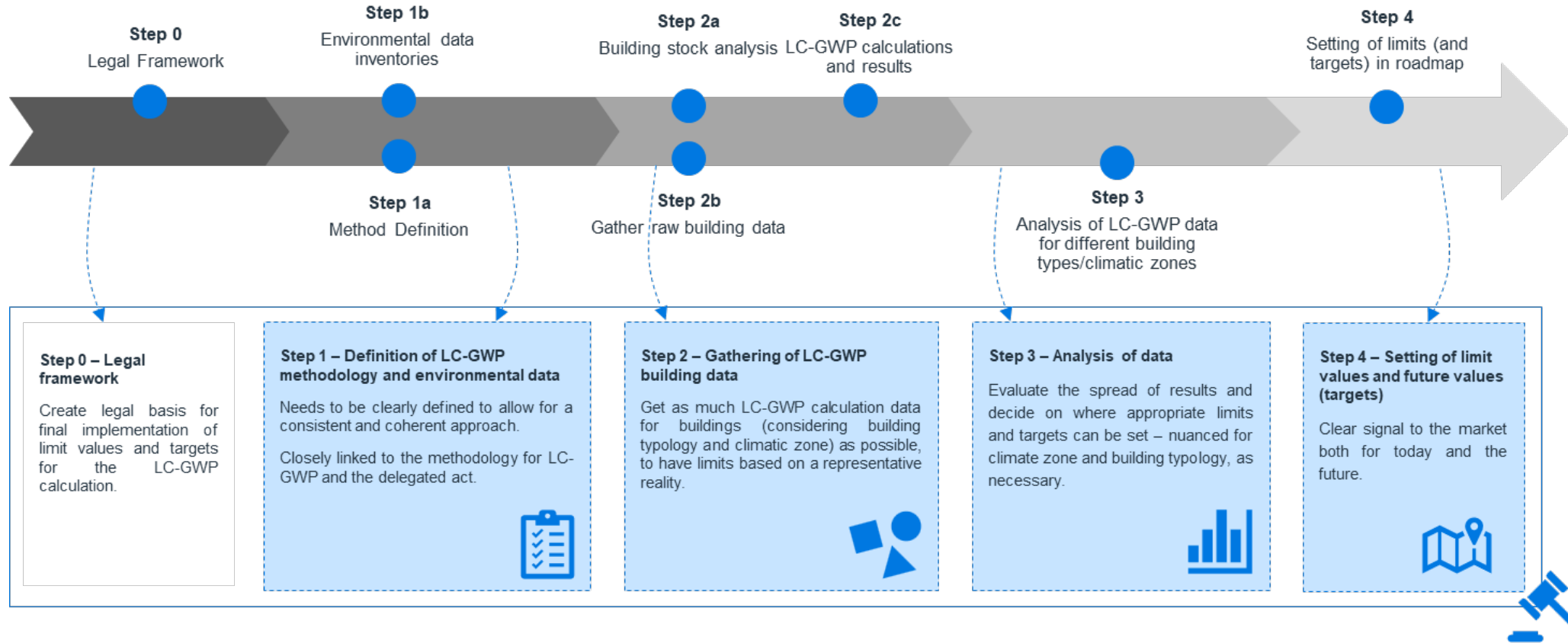
Article 7(5)

[...] maximum limit values, detailed for **different climatic zones and building typologies**.

Those maximum limit values shall be in line with the Union's objective of achieving climate neutrality. [...]

- **If relevant**, MS adapt the limit values for different climatic zones and building typologies.
- MS must set these limit values in line with the Union's objective of achieving climate neutrality.
- MS could consider the readiness of the market while encouraging the decarbonisation of the construction sector as soon as possible.

RECOMMENDED PROCESS



Step 0 : General considerations on legal framework during the whole process

NB : Proposed fast-track and example in the draft

RECOMMENDED PROCESS

Step 0 : General considerations on legal framework

- Necessary legal framework in place by May 2026 to comply with the transposition deadline. Other legal frameworks may be developed later, including actual limit values
- However, the first limit values must be in force no later than 1 January 2030
 - Of course, no GWP calculation = no limit value.
- Limit values implemented at the “as designed / applying for building permit” stage and reconfirm the compliance at the “as built” stage.
- Don’t forget about roles and responsibilities : calculation, submission of the calculated value, control and verification of the calculation, tool development, databases management, gathering and analysis of data, etc.

RECOMMENDED PROCESS

Step 1 : Methodology and environmental data

Step 1a – Methodology

- Delegated act – Meeting Expert Group

Step 1b – Environmental data

- CPR and compatible ESPR data must be used when available
- Generic data and default values for products and processes when specific data is not available or to simplify the calculation
 - Consider existing framework (regional or neighboring MS)
- Long-term perspective about the role and responsibility of any involved actors

RECOMMENDED PROCESS

Step 2 : Gathering of building life-cycle GWP data

Step 2a – Building stock

- Consider relevant available data and analysis including national building renovation plan, national database, etc
- Consider relevant factors, e.g. building typology, climatic zone, construction method, size of building, main building material, etc.

Step 2b – Raw building data

- Collecting Information needed for the life-cycle GWP calculation : Bill of materials, Floor area, EPC, etc.
- Possible different approaches : cases collection, variations in generic buildings, etc.

Step 2c - Life-cycle GWP calculations of buildings

RECOMMENDED PROCESS

MS may consider also continuously collecting life-cycle GWP data of new buildings following a standardised building fiche.

Step 3 : Analysis of life-cycle GWP building data

- Balance between available dataset and number of building typology

Step 4 : Setting limit values

- First limit values to be in place by 2030
- If relevant, must be nuanced by building typology or climatic zone
- Consider an “add-on” to the limit values to accommodate justified special needs based on building functionality (e.g. hospital) or equipment (e.g. PV)
- No mandatory scope, strongly recommended to have a long-term perspective
 - Progressive downward trend: future limit values comparable one to another

Setting limit values : scope of the life cycle stage for calculation vs limit values

- The scope of modules required **for the calculation** according to Article 7(2) = minimum requirement defined in the **delegated act**.
 - Useful particularly for the designer and project owner to have a good understanding of the sources of the emission.
- **Member States can choose** for their national regulation the scope of modules **for the limit values**, mentioned in Article 7(5), i.e. the scope of modules for the limit values **can** be more selective than the scope required for the calculation.
 - For example : Module D must be calculated, but MS may decide if they take into account (or not) this module in their national limit values.

Recommended timeline

Step	2025	2025	2026	2026	2027	2027	2028	2028	2029	2029	2030
	1 st half	2 nd half	1 st half	2 nd half	1 st half	2 nd half	1 st half	2 nd half	1 st half	2 nd half	1 st Jan.
Step 0 – Legal framework			Trans- position				Article 7(2) a.				Article 7(2) b. / (5)
Step 1a – Method definition		DA									
Step 1b – Environmental data inventories											
Step 2a – Building stock analysis											
Step 2b – Gather raw building data											
Step 2c – LC-GWP calculations and results											
Step 3 – Analysis of LC- GWP calculations											
Step 4 – Setting limit values								National scrutiny period			Article 7(5)
Roadmap				Article 7(5)							

- The process is not always linear. The earlier known, the better for market uptake.
- Consider voluntary approach before 2030.

COMMON ROADMAP TEMPLATE

Adjusted common roadmap template :

- Step 0 : General considerations on legal framework
- Step 1 : a) Methodology; b) Environmental data
- Step 2 : a) Building stock; b) Raw building data; c) Life-cycle GWP calculations
- Step 3 : Analysis of life-cycle GWP building data
- Step 4 : Setting limit values

Thank you!

