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EPBD BACS compliance checklist

Directive (EU) 2024/1275, Article 13 · Non-residential buildings · Asset Online Pvt Ltd (AOPL) · aopl.tech · status as of 4 Nov 2026

The Directive binds Member States (Art 38). Your duty comes from national law, and all 27 states received formal notice on 15 Jul 2026 for incomplete transposition. Duties apply where technically and economically feasible. This is a working summary of the official texts, not legal advice. Check national law before relying on it.

1. Which band are you in?

Output	EU text	Clause
70 kW or less	No Art 13(9) or 13(12) duty. No Art 23 inspection unless outputs add up to more than 70 kW.	-
Over 70 kW, up to 290 kW	BACS by 31 Dec 2029. Lighting controls by 31 Dec 2029.	Art 13(9)(b), 13(12)(b)
Over 290 kW	BACS by 31 Dec 2024. IEQ monitoring by 29 May 2026. Lighting controls by 31 Dec 2027.	Art 13(9)(a), 13(10)(d), 13(12)(a)

2. Scope and threshold

	Check	Reference
☐	Confirm the building is non-residential and find the national law that applies to it	Art 35, 38
☐	List every heating, air-conditioning and combined ventilation system with its manufacturer rated output	Art 2(49)
☐	Leave out systems serving non-EPB uses, such as industrial process hot water or refrigeration for storage	Notice 2.5, fn 20
☐	Test heating and cooling separately under EU guidance, then check whether your national guide adds them	Notice 2.5
☐	Note the national date and exemption test. They can differ from the EU text	Art 13(9)
☐	If you claim "not feasible", record the technical or economic basis in a dated report	Art 13(9), 13(12)

3. BACS functions

	Check	Reference
☐	Trend logs run continuously for energy use, by meter and by system, with no unexplained gaps	13(10)(a)
☐	Logged data is kept and can be exported by the owner	13(10)(a), 16(1)
☐	Reports compare energy use by period and area, and the operator can act on them	13(10)(a)
☐	Operators can adjust set points and schedules from the front end	13(10)(a)
☐	A baseline or benchmark is set for the building's energy efficiency	13(10)(b)
☐	Rules detect efficiency losses in technical building systems	13(10)(b)
☐	Alerts reach a named person responsible for the facility, with improvement opportunities	13(10)(b)
☐	BACS talks to connected systems and appliances in the building	13(10)(c)
☐	Other makers' equipment was shown working together, also for replaced components	13(10)(c)
☐	Coverage: heating, air conditioning and combined ventilation systems at least	Notice 2.5
☐	Assessed against EN ISO 52120-1 Class B; omitted items are documented	Notice 2.5, fn 21

4. IEQ monitoring

	Check	Reference
☐	Indoor temperature, relative humidity and CO2 monitored continuously in occupied spaces	Notice 3.2
☐	PM2.5 added where relevant	Notice 3.2
☐	Sub-system sensors exchange data with the main BACS	Notice 2.5
☐	If deferred to major renovation, the reason is recorded and national law allows it	Notice 3.2

5. Automatic lighting controls

	Check	Reference
☐	Built-in lighting is suitably zoned, by occupancy pattern	Art 13(12); Notice 2.8
☐	Occupancy detection meets EN ISO 52120-1 Table 5, ref. 5.1, level 2	Notice 2.8, Table 9
☐	Maintained illuminance is still met; delay times can be adjusted per zone	Notice 2.8
☐	Controls' own standby consumption is counted in the feasibility case	Notice 2.8

6. Records and contract

	Check	Reference
☐	Rated output register and threshold calculation	Art 2(49)
☐	Assessment report documented and passed to the owner	Art 13(6)
☐	Inspection exemption checked: BACS must meet 13(10), incl. IEQ since 29 May 2026	Art 23(7); Notice
☐	Owner and tenant access to building systems' data confirmed at no added cost	Art 16(1), 16(3)
☐	Who holds the duty in the lease is agreed (owner or tenant, per national law)	National law

Dated worksheet

Item	Answer
Country and national law	
Highest heating output (kW)	
Highest cooling output (kW)	
National deadline	
Exemption claimed?	
Reviewed by, date	

Sources: Directive (EU) 2024/1275 (OJ L, 8.5.2024); Commission Notice C/2025/6438 (OJ C, 18.12.2025), which is guidance only: binding interpretation rests with the Court of Justice; Commission news, 15 Jul 2026. Opened 4 Nov 2026. "Notice" numbers are sections of its Annex 10. The function checks are AOPL's own wording of the clauses, not legal text. Asset Online Pvt Ltd (AOPL) supplies and integrates solutions in this area. Contact: aopl.tech/contact-us