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# The National Whole Life Carbon Roadmap for Greece

*From Consultation to Implementation: Next Steps*

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WHY NOW

# Whole Life Carbon is now a regulatory obligation, not a voluntary ambition

## EPBD recast - Directive (EU) 2024/1275

Article 7: life-cycle Global Warming Potential (GWP) must be calculated and disclosed in the energy performance certificate of every new building.

Member States must publish a national roadmap with WLC limit values for new buildings, with targets from 2030.

Greece: the national transposition act and its implementing regulations are the next step - the roadmap is designed to support them.

Parallel drivers: EU Taxonomy, CSRD / ESRS E1, ETS2 for buildings (2027, postponed to 2028), CPR 2024/3110.

| | |
|---|---|
| **29 May 2026** | EPBD recast transposition deadline for Member States |
| **1 Jan 2028** | WLC-GWP disclosure mandatory for new buildings > 1,000 m² |
| **1 Jan 2030** | WLC-GWP disclosure mandatory for all new buildings |

THE POINT The clock is set in Brussels. The question for Greece is not whether, but how - and with what tools.

STARTING POINT

# Where Greece stood: a market ahead of its framework

THE PARADOX

**Market readiness exists**

EPD-verified low-carbon concrete deployed at scale (The Ellinikon, 300,000+ $m^3$, at least 30% lower embodied carbon). Full EPD suites published by Greek cement producers. Developers voluntarily applying LCA under LEED and BREEAM but mandatory for DGNB.

**The assessment infrastructure does not**

KENAK measures operational energy only - no $CO_2$, no embodied carbon. No national WLC benchmarks. No Greek-language calculation tool. No assessor's registry. No open building-carbon database.

**37%**

of global energy-related $CO_2$ comes from buildings and construction

**5**

ZCCRRF pillars assessed: Government, Technical, Finance, Data, Mindset

**D1 · D4 · M2**

Top gaps in the May 2025 national survey: tools, transparency, working group

**T3 · T4 · F1**

Top opportunities: EE technologies, renewables, financial incentives

TAKEAWAY The missing infrastructure is regulatory and methodological - not commercial. That is what a roadmap must build.

THE CONSULTATION

# How the actions were validated: two workshop streams, five pillars

## 1 Multi-Stakeholder Workshop

*13 October 2025 · Workshop Event · one day*

- 50+ professionals: developers, engineers, manufacturers, banks, academia, associations
- Panel discussion + four thematic tables
- Importance-vs-Likelihood quadrant method
- Pillars: Technical Solutions, Data, Finance, Mindset

## 2 Government Leadership Series

*22 Oct · 6 Nov · 12 Dec 2025 · Ministry of Environment & Energy*

- Dedicated series with ΥΠΕΝ directorates
- Meeting 1: validate survey results G1-G6
- Meeting 2: enabling actions, EU alignment, NECP / LTRS
- Meeting 3: SMART goals, indicators, timelines; 7 new strategies added (G7-G10, D6-D7, M5)

| 50+ | 3 | 5 | 39 | 2028 |
|---|---|---|---|---|
| stakeholders | ministry sessions | pillars validated | enabling actions | first EPBD deadline |

*ZCCRRF Stage 3 (validation workshops) of the WorldGBC Zero Carbon & Climate Resilience Readiness Framework. Results consolidated in the Workshop Results Analysis Report, submitted to WorldGBC ERN.*

KEY FINDINGS

# One critical gap and one priority action per pillar

| Pillar | Top opportunity | Critical gap | Priority enabling action |
|---|---|---|---|
| **Government Leadership** | G2 - National Energy Efficiency Strategy (NECP / LTRS) | Fragmented inter-ministerial coordination on WLC | G.EA6 - Permanent inter-ministerial WLC coordination body |
| **Technical Solutions** | T4 - Renewable energy integration | T5 - No affordable embodied-carbon calculation tools in Greek | T.EA1 - National definition and benchmarking framework aligned with EU Level(s) |
| **Finance** | F1 - Financial incentives framework | No WLC-aligned financial product framework | F.EA2 - National task force (ministries, banks, investors) to design WLC financial framework |
| **Data** | D1 - Tools and databases | D2 / D4 - KENAK excludes $CO_2$; no data transparency | D.EA2 - Extend KENAK to whole-life carbon benchmarking |
| **Mindset** | M3 / M4 - Capacity development | M2 - No national multi-stakeholder working group | M.EA1 - SBC Greece Advisory Committee on WLC & Resilience |

THREAD Every pillar points to the same structural need: coordination, measurement tools, and a common methodology.

STRATEGIC IMPERATIVES

# Five structural conditions for the WLC transition

**1** **Institutional architecture**

A permanent, multi-level coordination body bridging ΥΠΕΝ, Ministry of Development, SBC Greece, industry and academia.

**2** **Data infrastructure**

Extend KENAK to whole-life carbon, launch a national open-access building carbon database, introduce a Digital Building Passport.

**3** **EU regulatory alignment**

Complete EPBD transposition, prepare for ETS2 for buildings (2027, postponed to 2028), align with CSRD, EU Taxonomy and the National Climate Law.

**4** **Financial ecosystem**

Map EU and national instruments, convene a finance task force, ESG reporting templates, link performance to ENFIA and insurance.

**5** **Capacity building**

One unified training programme via SBC Greece, TEE and universities, covering all five pillars - 1,000+ professionals.

WHY IT MATTERS Data infrastructure enables every other pillar: without measurement there are no benchmarks, no green lending, no compliance.

THE ENABLING ACTIONS MATRIX

# 39 actions in three waves

QUICK WINS

## Q4 2025 - 2026

- M.EA1 SBC Greece Advisory Committee on WLC & Resilience
- F.EA2 National finance task force
- G.EA6 Inter-ministerial coordination mechanism
- D.EA1 / F.EA1 Mapping of data sources and financial instruments
- T.EA5 / M.EA3 CPD modules with TEE (pilot)

FOUNDATION

## 2026 - 2027

- D.EA2 KENAK extension to whole-life carbon
- T.EA1 National definition and benchmarking framework (Level(s))
- T.EA4 Greek-language embodied-carbon tool
- D.EA3 / D.EA7 Open-access carbon database, Digital Building Passport
- G.EA1 / G.EA3 NECP-LTRS update, sector decarbonisation strategy

MAINSTREAMING

## 2027 onwards

- G.EA2 Mandatory WLC reporting (EPBD Art. 7)
- G.EA4 Climate resilience in building regulations
- G.EA5 Level(s)-aligned certification framework
- G.EA11 / G.EA12 Materials industry strategy, national materials database
- M.EA6 National WLC certification pathway

STATUS Each action carries a timeline, an owner and a measurable indicator. The matrix feeds the ZCCRRF Regional Enabling Actions Matrix of WorldGBC.

FROM CONSULTATION TO COMMITMENT

# Workshop outputs became formal commitments to the Minister

## 01

### Validation workshops

*Oct - Dec 2025*

Two workshop streams produce a validated enabling-actions matrix across five pillars.

## 02

### Results Analysis Report

*Q1 - Q2 2026*

Consolidated findings, market evidence and a two-phase roadmap pathway. Submitted to WorldGBC ERN.

## 03

### EPBD Position Statement

*Q1 2026*

SBC Greece commits to the Minister of Environment & Energy: National WLC Framework, reference-building pilot, WLC/LCA assessors registry.

## 04

### Roadmap development

*Q3 2026 onwards*

Drafting committee under the SBC Greece Advisory Committee, with ΥΠΕΝ as institutional partner.

*The three commitments in the EPBD Position Statement are the anchor of the national roadmap: a National WLC Framework, a Reference-Building Pilot, and a National WLC/LCA Assessors Registry.*

THE MODEL Capacity-building projects usually end at the report. This one converted workshop outputs into institutional commitments.

NEXT STEPS · PHASE A

# Roadmap drafting: Q3 2026 - Q1 2027

**1 Drafting Committee**

Under the SBC Greece WLC & Resilience Advisory Committee, with ΥΠΕΝ / ΓΓΧΣΑΠ, ΤΕΕ, academia, industry, finance. Chaired by SBC Greece with a Technical Secretariat.

**2 Methodology and scope**

WorldGBC #BuildingLife roadmap methodology, harmonised with EPBD Articles 7, 9, 11, ΕΣΑΚ, NECP and the National Climate Law.

**3 Gap analysis**

Each enabling action mapped against KENAK, EPCs, Building Passport pilots, Level(s), EPD uptake and ECO Platform alignment.

**4 Sector sub-roadmaps**

Residential, non-residential, public buildings, infrastructure - each with tailored milestones and KPIs.

**5 Baseline and targets**

2026 baseline; WLC reduction milestones for 2030, 2040 and 2050 aligned with the EU trajectory.

**6 Institutional framework**

Memorandum of Understanding between SBC Greece and ΥΠΕΝ / ΓΓΧΣΑΠ giving the roadmap formal status as a national reference instrument.

**7 Public consultation**

OpenGov platform plus regional workshops co-hosted with ΤΕΕ.

**8 Endorsement and publication**

SBC Greece Board, ΥΠΕΝ and ΓΓΧΣΑΠ; published on sbcgreece.org and ypen.gov.gr.

**OUTPUT** A published, stakeholder-endorsed National WLC Roadmap by Q1 2027 - one year before the first EPBD disclosure obligation.

NEXT STEPS · PHASE B

# Roadmap implementation: Q2 2027 onwards

### Governance

Steering Committee chaired by ΥΠΕΝ, co-chaired by SBC Greece; Technical Secretariat hosted by SBC Greece; built on the inter-ministerial body (G.EA6).

### Resource mobilisation

RRF residual envelope, EU Modernisation Fund, LIFE, Horizon Europe, plus blended-finance vehicles designed by the finance task force (F.EA2).

### Phased activation

Quick wins, foundation and mainstreaming actions activated in the sequence of the matrix.

### Annual progress report

To ΥΠΕΝ, SBC Greece members and WorldGBC ERN: $kgCO_2e/m^2$/year benchmarks, EPD uptake, Building Passport coverage, certified assessors.

### Milestone reviews

Mid-term review 2030; reviews 2035 and 2040 recalibrated to ETS2, Taxonomy and MEPS developments.

### Live KPI dashboard

Open-access, under the national building carbon database (D.EA3), for policymakers, investors and the public.

**PRINCIPLE** A roadmap is a governed, financed and measured process - not a document.

CRITICAL SUCCESS FACTORS

# What the roadmap needs from institutions & what SBC Greece delivers

## FROM THE STATE

### Sustained political ownership

Ministerial-level commitment from ΥΠΕΝ and ΓΓΧΣΑΠ, coordinated with Development, Finance and Infrastructure.

### Completion of EPBD transposition

Implementing regulations for Article 7 WLC disclosure and the extension of KENAK to embodied carbon.

### Adequate and predictable financing

Blended-finance architecture with disbursement criteria tied to roadmap KPIs; fiscal incentives (ENFIA, expedited permitting).

## FROM SBC GREECE

### National WLC Framework

Common methodology operationalising Article 7 disclosure - as committed in the EPBD Position Statement.

### National WLC/LCA Assessors Registry

Minimum qualifications, accredited CPD pathways with TEE and universities, quality assurance.

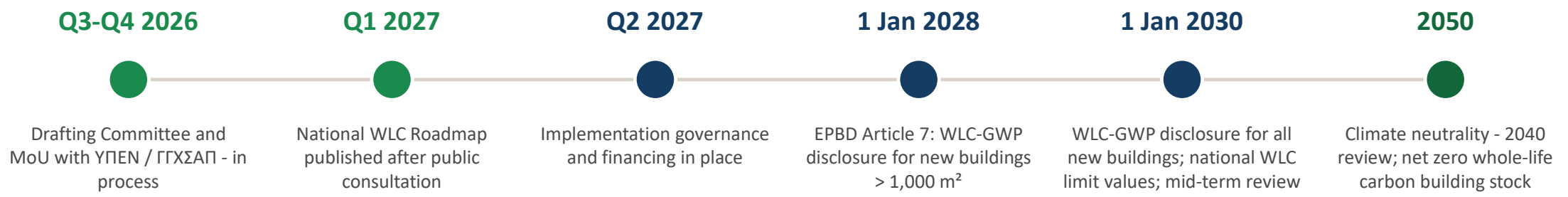
### Reference-Building Pilot

ECO Platform-aligned EPD ecosystem and empirical baseline for benchmarks and policy calibration.

**INVITATION** e-CODOMH members are invited to the Drafting Committee and the public consultation - materials, tools and skills are three of its five pillars.

MILESTONES

# The road to 2030 and beyond




*Roadmap milestones (green) are SBC Greece / ΥΠΕΝ deliverables set out in the Results Analysis Report. Regulatory milestones (navy) derive from Directive (EU) 2024/1275.*

**ONE YEAR** A published roadmap by Q1 2027 leaves one year to build the tools, the registry and the benchmarks before the first disclosure obligation.

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# The market is ready.
# The roadmap builds the rails.

With thanks to the Ministry of Environment and Energy, the WorldGBC Europe Regional Network, the SBC Greece workshop coordinators, and the 50+ stakeholders who contributed to the national consultation.

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www.sbcgreece.org · Full report: WLC Workshop Results Analysis, SBC Greece / WorldGBC ERN

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