

European Alliance for Smart, Demand-Driven Charging

(EPBD Article 14)

Joint Business Statement on Simplifying the Mobility Requirements in Article 14 of the Energy Performance of Buildings Directive

Brussels, 26 February 2026,

The undersigned organisations, representing the retail, wholesale, real estate and retail real estate sectors call for a targeted simplification and revision of the charging station requirements in Article 14 of the Energy Performance of Buildings Directive (EPBD), so that the rules better reflect actual user needs, grid constraints and different building typologies while supporting the EU's climate and mobility objectives. This request is strictly limited to Article 14: we urge the Commission not to reopen the EPBD as a whole, but to confine any simplification exclusively to Article 14, as set out in this letter.

For non-residential buildings with more than 20 parking spaces, Article 14.2 currently requires, by 1 January 2027, at least one charging point per ten spaces or ducting for 50% of spaces, alongside prescriptive bicycle-parking ratios. This rigid, purely quantitative approach focuses on counting sockets and ducted spaces rather than on the quality and usability of the charging infrastructure. It does not reflect the specific operating conditions of many non-residential buildings. In these contexts, the type and power of chargers matter more than the sheer number of slow charging points in achieving the objectives of Article 14.

We welcome the European Commission's recent guidance on Article 14, which is an important step towards a more pragmatic implementation. The guidance clarifies, for instance, that existing conduits can in many cases count as "ducting", that indoor and outdoor parking areas may be considered together to meet thresholds, that fewer high-power chargers may be more appropriate for large retail centres than many low-power ones, and that bicycle-parking requirements can be adapted for locations not typically accessed by bicycles. However, this guidance is not legally binding and cannot on its own ensure a coherent implementation across Member States.

We welcome incentives to support transition to e-mobility, provided the measures are effective, economically viable and proportionate. However, many businesses are facing significant challenges in complying with the current requirements due to limited grid capacity and high costs.

In line with the simplification agenda of the Commission, **we therefore ask that only Article 14 of the EPBD be included in a future omnibus proposal or initiatives like the Electrification Action Plan, to simplify requirements and reduce the burden for businesses. A revision of these provisions is needed as soon as possible, as Member States are starting to transpose**

the requirements into national law and future proposals like the Greening Corporate Fleets proposal are likely to further increase grid capacity needs.

We call on the Commission to explore ways to simplify and support sustainable and green mobility, for example, by allowing and promoting a demand-oriented approach in the implementation of the EPBD. The total charging capacity, if contracted power allows, is more important than the number of (slow) charging points in achieving the objectives of the EPBD.

Therefore, a flexible approach to Article 14 is needed, allowing fewer but more powerful recharging points, provided that the Directive's overall objectives on charging availability and uptake are met. Existing recharging points should be grandfathered to avoid unnecessary replacement when Member States transition to a more flexible, demand-oriented approach.

We would welcome the opportunity to meet with your services to discuss this further and provide input from our sectors.

Best regards,

