

Draft government proposal to Parliament for an act amending the Act on Equipping Buildings with Electric Vehicle Recharging Points and Recharging Point Capabilities and Automation and Control Systems

MAIN CONTENT OF THE PROPOSAL

The proposal recommends amending the Act on Equipping Buildings with Electric Vehicle Recharging Points and Recharging Point Capabilities and Automation and Control Systems. The legislative amendment would contribute to the implementation of the recast Energy Performance of Buildings Directive (EU) 2024/1275. The requirements of the Directive would be implemented as minimum requirements and in accordance with the Programme of Prime Minister Petteri Orpo's Government in such a way as to avoid imposing unreasonable obligations on residents and property owners.

The act would lay down requirements set out in the Energy Performance of Buildings Directive for buildings to be equipped with recharging points and recharging point capabilities for electric vehicles, as well as bicycle parking spaces. The requirements would apply to new buildings and buildings undergoing major renovation, and, in the case of non-residential buildings, to existing buildings as well.

The act would provide for the requirement for a building automation and control system in accordance with the recast Directive. Automation and control systems should be installed if the conditions laid down in the act were met, and if it was technically and economically feasible.

The act is intended to enter into force as soon as possible.

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EXPLANATORY NOTE

1 Background and preparatory work

1.1 Background

The government proposal is based on Directive (EU) 2024/1275 of the European Parliament and of the Council on the energy performance of buildings (recast) (hereinafter the 'Energy Performance of Buildings Directive' or the 'recast Energy Performance of Buildings Directive'). The Directive on the Energy Performance of Buildings entered into force on 28 May 2024, and it must be implemented in the Member States by 28 May 2026.

The revision of the Energy Performance of Buildings Directive is part of the EU's Fit for 55 package, which aims to reduce EU emissions by at least 55 per cent by 2030 and to achieve climate neutrality by 2050. The role of buildings in achieving these goals is significant, as buildings account for 40 per cent of total energy consumption in the Union and generate 36 per cent of its energy-related greenhouse gas emissions. However, 75 per cent of buildings in the Union are still energy-inefficient.

The recast Energy Performance of Buildings Directive requires Member States to take a number of measures aimed at reducing greenhouse gas emissions and final energy consumption in buildings. Regulation (EU) 2021/1119 of the European Parliament and of the Council (7) establishes in Union law the objective of economy-wide climate neutrality by 2050 at the latest and establishes a binding intra-Union obligation to reduce net greenhouse gas emissions (emissions after the deduction of removals) by at least 55 per cent compared to 1990 levels by 2030.

The key instruments of the recast Energy Performance of Buildings Directive are minimum energy performance requirements for buildings and the preparation of a national renovation plan. Under the Directive, Member States must also implement legislation related to facilities such as building automation and control systems, technical systems, solar energy installations, electric vehicle recharging points and bicycle parking spaces. In addition, the Directive requires amendments to the legislation on energy performance certificates for buildings.

The corresponding Directives that preceded the recast Energy Performance of Buildings Directive have been implemented in Finland through several pieces of legislation. These include the Act on the Energy Performance Certificates for Buildings (50/2013), the Act on the Energy Performance Certificate Information System for Buildings (147/2015), the Act on Equipping Buildings with Electric Vehicle Recharging Points and Recharging Point Capabilities and Automation and Control Systems (733/2020) and the Construction Act (751/2023). National regulations concerning the Directive are also set out in a number of subordinate statutes, such as government decrees and decrees issued by the Ministry of the Environment. This proposal would implement the requirements of the Energy Performance of Buildings Directive that are related to the equipping of buildings with electric vehicle recharging points, recharging point capabilities, bicycle parking spaces, and automation and control systems.

As regards the energy efficiency of buildings, the Programme of Prime Minister Petteri Orpo's Government states: 'Energy consumption in construction will be reduced and the energy efficiency of buildings improved through cost-effective means. Efforts will be made to ensure that the entries in the EU Energy Performance of Buildings Directive allow as much

national room for manoeuvre as possible. In the implementation of the EU Energy Performance of Buildings Directive, no unreasonable obligations should be imposed on residents and property owners. If new obligations are introduced, the Government will ensure that all households have the opportunity to respond to the obligations arising from regulation.’ (p. 126)

1.2 Preparatory work

1.2.1 Preparation of the recast Energy Performance of Buildings Directive

On 15 December 2021, the European Commission adopted a proposal for a recast Directive of the European Parliament and of the Council on the energy performance of buildings (COM(2021) 802 final). The proposal complemented the European Commission’s Fit for 55 package of 14 July 2021, through which the EU aims to reduce net greenhouse gas emissions by at least 55 per cent by 2030. The proposal was accompanied by a Commission evaluation report on the recast of the Directive (SWD(2021) 453 final). The Government submitted a Union communication to Parliament on the Commission’s proposal for a Directive of the European Parliament and of the Council on the energy performance of buildings (recast) (Government’s Union communication U 26/2022 vp).

The Ministry of the Environment and Finland were actively involved in the negotiations concerning the update of the Directive and stressed that the improvement of the energy efficiency of the building stock will bring significant environmental and health benefits, as well as cost benefits to residents. They also stressed that the changes should not lead to unreasonable costs for households and businesses. Finland emphasised that individual residential buildings should not be subject to energy-saving obligations; instead, they should be monitored nationwide. During the negotiations, Finland emphasised that the compulsory renovation of individual buildings is not a sensible approach; rather, buildings should be repaired in a timely and cost-effective manner in accordance with their life cycle. The outcome of the negotiations was broadly in line with Finland’s objectives.

1.2.2 Drafting of the government proposal

In August 2024, the Ministry of the Environment established a monitoring group to support and monitor the national implementation of the Energy Performance of Buildings Directive (VN/14781/2024). The monitoring group discusses and comments on draft legislation under preparation and supports its preparation. The monitoring group makes suggestions on how to keep regulation, administrative burdens and bureaucracy to a minimum despite the new and increased requirements in the Directive. It is also tasked with increasing cooperation in the field of real estate and construction and ensuring information exchange and interaction with the persons involved in the preparation of official acts. The monitoring group is divided into three different preparatory groups, which are preparing in more detail the legislative amendments required by the Energy Performance of Buildings Directive. The draft provisions contained in this proposal were discussed by the preparatory group and the monitoring group in early 2025.

Sections 18 and 27 of the Act on the Autonomy of Åland (1144/1991) provide for the division of authority between the State and Åland. The bill concerning electric vehicle recharging points and recharging point capabilities, as well as building automation and control systems, is related to matters that fall within the legislative powers of the region of Åland pursuant to section 18 of the Act on the Autonomy of Åland, as the bill concerns building and planning

activities and housing production as referred to in subsection 7 of that section. The region of Åland is therefore responsible for the implementation of the Directive on its territory.

In autumn 2024, the Ministry of the Environment commissioned Motiva Oy to carry out a background study concerning electric vehicle recharging point capabilities and requirements under the Energy Performance of Buildings Directive to support Finland’s implementation of the Directive. The assessment of the current situation and the impact assessment regarding recharging points included in this government proposal are based largely on that report. With regard to automation and control systems and technical systems, the Ministry of the Environment commissioned a report from Eurofins Expert Services Oy. The reports are available in the Government Project Register Hankeikkuna under project ID YM004:00/2025.

The government proposal was drawn up by the Ministry of the Environment. The government proposal was open for consultation on lausuntopalvelu.fi between xx xx 2025 and xx xx 2025.

2 The main provisions of the Energy Performance of Buildings Directive

2.1 Electric vehicle recharging points, recharging point capabilities and bicycle parking spaces

Article 14 of the Energy Performance of Buildings Directive, entitled ‘Infrastructure for sustainable mobility’, sets out requirements for electric vehicle recharging points, recharging point capabilities and bicycle parking spaces, which Member States are required to implement nationally. The previous Directive also contained requirements regarding recharging points and recharging point capabilities installed adjacent to buildings, but the new Directive introduces requirements for bicycle parking spaces as well. In addition, compared to the previous Directive, the required number of recharging points and recharging point capabilities has been increased.

The following table sets out the requirements of the recast Energy Performance of Buildings Directive regarding recharging points, recharging point capabilities and bicycle parking spaces. In order to facilitate readability and discussion, this government proposal divides various buildings into categories.

Table 1. Requirements of the Energy Performance of Buildings Directive related to electric car recharging points, recharging point capabilities and bicycle parking spaces.

	Requirements of the Energy Performance of Buildings Directive
New non-residential buildings and those undergoing major renovation with more than 5 car parking spaces (category 1, Article 14(1))	<ul style="list-style-type: none"> • At least one recharging point for every five car parking spaces; and • pre-cabling for at least 50 % of car parking spaces and ducting for the remaining car parking spaces; and • bicycle parking spaces representing at least 10 % of total or 15 % of average user capacity, taking into account the space also required for bicycles with larger dimensions than standard bicycles

New office buildings and those undergoing major renovation (category 1.1, Article 14(1)(4))	<ul style="list-style-type: none"> • At least one recharging point for every two car parking spaces; and • pre-cabling for at least 50 % of car parking spaces and ducting for the remaining car parking spaces; and • bicycle parking spaces representing at least 10 % of total or 15 % of average user capacity, taking into account the space also required for bicycles with larger dimensions than standard bicycles
Existing non-residential buildings with more than 20 car parking spaces (category 2, Article 14(2))	<ul style="list-style-type: none"> • At least one recharging point for every 10 car parking spaces or ducting for at least 50 % of car parking spaces; and • bicycle parking spaces representing 10 % of total or 15 % of average user capacity, taking into account the space also required for bicycles with larger dimensions than standard bicycles • The obligations will enter into force on 1 January 2027 or 1 January 2029
Existing buildings owned by public bodies (category 2.1, Article 14(2)(2))	<ul style="list-style-type: none"> • In addition to the above-mentioned category 2 obligations (Article 14(2)), • pre-cabling for at least 50 % of car parking spaces by 1 January 2033
New residential buildings with more than 3 car parking spaces (category 3.1, Article 14(4))	<ul style="list-style-type: none"> • At least one recharging point; and • pre-cabling for at least 50 % of car parking spaces and ducting for the remaining car parking spaces; and • at least two bicycle parking spaces for each residential building unit
Residential buildings with more than 3 parking spaces undergoing major renovation (category 3.2, Article 14(4))	<ul style="list-style-type: none"> • pre-cabling for at least 50 % of car parking spaces and ducting for the remaining car parking spaces; and • at least two bicycle parking spaces for each residential building unit

Article 14 of the Directive also contains more specific provisions on the scope of the requirements, possible exemptions, technical requirements for recharging points, and the obligation of Member States to remove administrative barriers to the installation of recharging points.

The Directive contains provisions on when parking spaces are deemed to be connected to a building in such a way that the requirements for the installation of recharging points must be complied with (specification of scope). In cases in which the obligation to install recharging points for electric vehicles is related to the construction of a new building or the renovation of an existing one, the scope has been further specified. Where existing buildings are concerned, the Directive does not specify the scope.

For categories 1, 1.1, 3.1 and 3.2, the recharging point requirements apply where

- a) the car park is located *inside* the building, and, for major renovations, renovation measures include the car park or the electrical infrastructure of the building; or
- b) the car park is *physically adjacent to the building*, and, for major renovations, renovation measures include the car park or the electrical infrastructure of the car park.

Article 2(65) of the Directive defines the meaning of a ‘car park physically adjacent to a building’. It refers to a car park which is intended for the use of residents, visitors or workers of a building, and which is located within the property area of the building or is in the direct vicinity of the building.

Regarding category 2, i.e. existing buildings, the article does not specify the scope. The Directive therefore does not specify in detail what is meant by buildings *with* more than 20 car parking spaces. ‘*With*’ is a standard term and is interpreted to mean parking spaces intended for the users of the building (see Chapter 5.1.2 below).

The Directive sets out requirements for the design of recharging points for electric vehicles. Article 2 of the Directive defines a recharging point, pre-cabbling, bi-directional recharging and smart recharging. In relation to Article 14, Article 2 also defines a roofed car park and a micro-isolated system. Under Article 14(6), recharging points should be capable of smart recharging and, where appropriate, bi-directional recharging and of being operated on the basis of non-proprietary and non-discriminatory communication protocols and standards, in an interoperable manner, and in compliance with any European standards and delegated acts adopted pursuant to Article 21(2) and (3) of Regulation (EU) 2023/1804. In addition, Article 14(7) provides that Member States must encourage that operators of non-publicly accessible recharging points operate them in accordance with Article 5(4) of Regulation (EU) 2023/1804, where applicable (publicly accessible recharging points). In addition, in the case of new buildings and buildings undergoing major renovation, Member States should ensure that the pre-cabbling and ducting are dimensioned so as to enable the simultaneous and efficient use of the required number of recharging points and support, where appropriate, the installation of a load or recharging management system, to the extent that this is technically and economically feasible and justifiable.

In accordance with Article 2(33) of the Energy Performance of Buildings Directive, a recharging point means a recharging point as defined in Article 2(48) of Regulation (EU) 2023/1804 of the European Parliament and of the Council (27). The definition therefore refers to the EU Alternative Fuels Infrastructure Regulation (AFIR). According to Article 2 of the AFIR, a ‘charging point’ means a fixed or mobile, on-grid or off-grid interface for the transfer of electricity to an electric vehicle which, although it may have one or more connectors to accommodate different connector types, is capable of recharging only one electric vehicle at a

time, and which excludes devices with a power output less than or equal to 3.7 kW the primary purpose of which is not the recharging of electric vehicles. In addition, under the Annex II to the Regulation, alternating current normal-power recharging points for electric vehicles must be equipped, for interoperability purposes, at least with socket-outlets or vehicle connectors of Type 2 as described in standard EN IEC 62196-2:2017. The Regulation divides recharging points by power into the following types: (1) a high-power recharging point is a recharging point with a power output of more than 22 kW; and (2) a normal-power recharging point is a recharging point with a power output less than or equal to 22 kW. Under the Regulation, 'power output' means the theoretical maximum power that a recharging point, station or pool, or a shore-side electricity supply installation can provide to vehicles connected to that recharging point. The Regulation does not therefore require that power to be available at all times. Often, it is possible to use load management to, for example, temporarily limit the recharging power to a lower level. While an electric car can be recharged using a standard protective contact socket at a slow speed, it is not recognised as a recharging point in the Alternative Fuels Infrastructure Regulation.

Under the recast Directive, ensuring the possibility of recharging L-category electric vehicles in the future must also be considered when building recharging point capabilities. However, this addition has no bearing on the development of recharging capabilities, as the recharging of L-category vehicles such as mopeds, motorcycles or electric bicycles does not require any recharging capabilities that are not already present in the car recharging infrastructure.

The requirements of the Energy Performance of Buildings Directive concerning bicycle parking do not specifically define the quality requirements or characteristics of bicycle parking spaces. According to the definition in the Directive, a bicycle parking space is the space required for one bicycle. The only additional requirement is the requirement to take into account the space required for bicycles with larger dimensions than standard bicycles. Examples of bicycles with larger dimensions than standard bicycles include cargo bicycles and bicycles fitted with a trailer.

Article 14 also allows for derogating from the requirements or extending the scope in certain situations. First, Member States may postpone the implementation of the requirements for category 2 (existing buildings) from 1 January 2027 to 1 January 2029, provided that the building in question has been renovated during the two years preceding the entry into force of the Directive, i.e. between 28 May 2022 and 28 May 2024, to comply with the national requirements under Article 8(3) of the previous Directive. This provision was implemented in Finnish legislation through section 7 of the Act on Recharging Points (733/2020), which stipulates that the owner of an existing non-residential building with more than 20 car parking spaces in the building or on the property must ensure that at least one recharging point is installed by 31 December 2024 at the latest. Consequently, if the owner of the building has installed electric vehicle recharging points in accordance with the Act on Recharging Points between 28 May 2022 and 28 May 2024, and if the Member State so decides, the requirements for recharging points under the new Directive will not apply to them until 1 January 2029. In this case, the term 'renovation' can be interpreted to refer to the installation of recharging points for electric cars.

Article 14 also allows for derogations from the requirements for recharging points for certain categories of buildings in certain situations. First, Member States may choose not to apply the requirements to specific categories of buildings where the recharging infrastructure required would rely on micro-isolated systems or the buildings are situated in the outermost regions within the meaning of Article 349 of the Treaty on the Functioning of the European Union

where this would lead to substantial problems for the operation of the local energy system and would endanger the stability of the local grid. Finland does not have such micro-isolated systems, nor is Finland or any part of Finland located in such remote regions, and this exemption therefore cannot be applied in Finland. Second, the requirements for recharging points may be waived where the cost of the recharging and ducting installations exceeds at least 10 per cent of the total cost of the major renovation of the building.

Under Article 14, Member States may also derogate from the requirements for bicycle parking spaces. They may adjust the requirements for the number of bicycle parking spaces concerning categories 1 and 2 (non-residential buildings) for specific categories of non-residential buildings that are not typically accessed by bicycles. In addition, in the case of residential buildings (categories 3.1 and 3.2), Member States may, subject to an assessment by local authorities and taking into account local characteristics, including demographical, geographical and climate conditions, adjust the requirements for the number of bicycle parking spaces. Where, in the case of major renovation, ensuring two bicycle parking spaces for every residential building unit is not feasible, Member States must ensure as many bicycle parking spaces as appropriate.

Article 14(8) requires Member States to provide for measures to simplify, streamline and accelerate the procedure for the installation of recharging points in new and existing, residential and non-residential buildings, especially of co-owners' associations, and remove regulatory barriers, including permitting and approval procedures from public authorities without prejudice to the property and tenancy law of the Member States. Member States must remove barriers to the installation of recharging points in residential buildings with parking spaces, in particular the need to obtain consent from the landlord or co-owners for a private recharging point for own use. A request by tenants or co-owners to be allowed to install recharging infrastructure in a parking space may be refused only if there are serious and legitimate grounds for doing so. Without prejudice to their property and tenancy law, Member States must assess administrative barriers regarding the application for the installation of a recharging point in a building with multiple residential building units at a tenants' or a co-owners' association.

2.2 Technical building systems and automation and control systems

Automation and control systems were added to the scope of the Energy Performance of Buildings Directive in 2018. Under the recast Energy Performance of Buildings Directive, Member States must set new requirements for the installation of automation and control systems and their characteristics in addition to previously established requirements. The recast Directive also requires Member States to introduce updated overall energy performance requirements for technical building systems.

In accordance with Article 2(6) of the Directive, 'technical building systems' mean technical equipment of a building or building unit used for

- space heating,
- space cooling,
- ventilation,
- domestic hot water,

- built-in lighting,
- building automation and control,
- on-site renewable energy generation and
- energy storage

or a combination thereof, including those systems using energy from renewable sources. Compared with the 2018 Energy Performance of Buildings Directive, the list of technical building systems includes on-site renewable energy generation instead of on-site electricity generation and energy storage as a newly added separate system.

Under Article 2(7), ‘building automation and control system’ means a system comprising all products, software and engineering services that can support energy-efficient, economical and safe operation of technical building systems through automatic controls and by facilitating the manual management of those technical building systems.

Article 2 also defines what is meant by ‘on-site’ and ‘energy from renewable sources’. On-site means in a particular building or on the land on which that building is located. Renewable energy means energy from renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, osmotic energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogas.

Article 13 of the Energy Performance of Buildings Directive provides for the technical building systems. According to paragraph 1 thereof, Member States must, for the purpose of optimising the energy use of technical building systems, set system requirements, using energy-saving technologies, in respect of the overall energy performance, the proper installation, the appropriate dimensioning, adjustment and control and, where appropriate, the hydronic balancing of the technical building systems which are installed in new or existing buildings. When setting up the requirements, Member States must take account of design conditions and typical or average operating conditions. According to the same paragraph, system requirements must be set for new and for the replacement and upgrading of existing technical building systems and must be applied in so far as technically, economically and functionally feasible. Under the paragraph, Member States must also ensure that the requirements they set for technical building systems reach at least the latest cost-optimal levels. Article 13 also lays down requirements that Member States may choose to introduce. Under Article 13(1)(3), Member States may set requirements related to the greenhouse gas emissions of, or to the type of fuel used by heat generators or to the minimum part of renewable energy used for heating at building’s level, provided that such requirements do not constitute an unjustified market barrier.

Article 13 of the Energy Performance of Buildings Directive provides for the equipping of buildings with automation and control systems. The Directives that preceded the recast directive also contained provisions on automation and control systems. The following table shows the differences between the recast Directive and the 2018 Directive as regards automation and control systems.

Table 2. Differences between the recast Directive and the 2018 Directive regarding automation and control systems.

Recast Energy Performance of Buildings Directive, new requirements in bold	2018 Energy Performance of Buildings Directive
<p>Member States must lay down requirements to ensure that, where technically and economically feasible, non-residential buildings are equipped with building automation and control systems, as follows:</p> <p>a) by 31 December 2024, non-residential buildings with an effective rated output for heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation of over 290 kW;</p> <p>b) by 31 December 2029, non-residential buildings with an effective rated output for heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation of over 70 kW.</p>	<p>Member States must lay down requirements to ensure that, where technically and economically feasible, non-residential buildings with an effective rated output for heating systems or systems for combined space heating and ventilation of over 290 kW are equipped with building automation and control systems by 2025.</p>
<p>Building automation and control systems must be capable of:</p> <p>a) continuously monitoring, logging, analysing and allowing for adjusting energy use;</p> <p>b) benchmarking the building's energy efficiency, detecting losses in efficiency of technical building systems, and informing the person responsible for the facilities or technical building management about opportunities for energy efficiency improvement;</p> <p>c) allowing communication with connected technical building systems and other appliances inside the building, and being interoperable with technical building systems across different types of proprietary</p>	<p>Building automation and control systems must be capable of:</p> <p>a) continuously monitoring, logging, analysing and allowing for adjusting energy use;</p> <p>b) benchmarking the building's energy efficiency, detecting losses in efficiency of technical building systems, and informing the person responsible for the facilities or technical building management about opportunities for energy efficiency improvement; and</p> <p>c) allowing communication with connected technical building systems and other appliances inside the building, and being interoperable with technical building systems across different types of proprietary technologies, devices and manufacturers.</p>

<p>technologies, devices and manufacturers;</p> <p>d) by 29 May 2026 monitoring of indoor environmental quality.</p>	
<p>Member States must lay down requirements to ensure that, where technically, economically and functionally feasible, from 29 May 2026, new residential buildings and residential buildings undergoing major renovations are equipped with the following:</p> <p>a) the functionality of continuous electronic monitoring that measures systems' efficiency and informs building owners or managers in the case of a significant variation and when system servicing is necessary;</p> <p>b) effective control functionalities to ensure optimum generation, distribution, storage, use of energy and, where applicable, hydronic balance;</p> <p>c) a capacity to react to external signals and adjust the energy consumption.</p> <p>Member States may exclude single-family houses undergoing major renovations from the requirements laid down in this paragraph where the costs of installation exceed the benefits.</p>	<p>Member States may lay down requirements to ensure that residential buildings are equipped with:</p> <p>a) the functionality of continuous electronic monitoring that measures systems' efficiency and informs building owners or managers when it has fallen significantly and when system servicing is necessary; and</p> <p>b) effective control functionalities to ensure optimum generation, distribution, storage and use of energy.</p>
<p>Member States must lay down requirements to ensure that, where technically and economically feasible, non-residential buildings with an effective rated output for heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation of:</p> <p>a) over 290 kW are equipped with automatic lighting controls by 31 December 2027;</p> <p>b) over 70 kW are equipped with automatic lighting controls by 31</p>	

December 2029.

The automatic lighting controls must be suitably zoned and capable of occupancy detection.

The requirement to equip buildings with automation and control systems is therefore tightened so that, from the beginning of 2030, buildings with an effective rated output for heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air-conditioning and ventilation of over 70 kW must also be equipped with automation and control systems. Furthermore, while it was previously optional for Member States to set requirements for the installation of automation and control systems in new residential buildings and those undergoing major renovation, this is now a mandatory requirement. Another new requirement is that buildings must be fitted with automatic lighting controls. All the requirements apply only where this is technically and economically feasible, and, in the case of residential buildings, also functionally feasible.

3 Current situation and its assessment

3.1 Recharging points, recharging point capabilities and bicycle parking spaces

3.1.1 Key national legislation

In Finland, legislation that requires the construction of recharging points has been in place since 2020, when the Act on Equipping Buildings with Electric Vehicle Recharging Points and Recharging Point Capabilities and Automation and Control Systems (733/2020, hereinafter the 'Recharging Points and Automation Act') entered into force. The requirements of the Act are largely based on the requirements of the Energy Performance of Buildings Directive. Certain requirements for recharging points were implemented more ambitiously in Finland than required by the Directive. In new residential buildings and those undergoing major renovation, the Directive required recharging points to be installed in buildings with more than 10 car parking spaces, whereas under Finland's national legislation, this obligation applies to buildings with more than four car parking spaces. The Recharging Points and Automation Act also contains national regulations related to parking facilities which are intended to provide parking for one or more residential buildings.

The Recharging Points and Automation Act sets out requirements for equipping buildings with recharging points for electric vehicles. The requirements of the Act concern the number of recharging points to be installed in buildings and the type of recharging point capabilities they must have. In accordance with the Directive, the legal requirements vary depending on whether the building is new, a building undergoing major renovation, or an existing building, and whether it is a residential building or another type of building. The Act also lays down the technical requirements that recharging points must fulfil and the organisation of the monitoring of the requirements for electric vehicle recharging points.

Under section 2 of the Act, it provides for the equipping of buildings with electric vehicle recharging points and recharging point capabilities, and automation and control systems. Under the same section, the Act applies only to buildings in which energy is used to maintain the indoor climate. However, under the following subsection of the same section, certain

provisions also apply to multi-storey car parks intended to provide parking for one or more residential buildings, even if no energy is used in them to maintain the indoor climate. The legal requirement does not apply to all multi-storey car parks, including park-and-ride car parks related to transport networks. This is a nationally prescribed obligation that is not based on the Directive. The same section also excludes buildings used by the defence administration from the scope of the Act.

Section 3 lays down the definitions of the Act. In terms of recharging points, the Act lays down the definitions of recharging point capabilities, residential buildings and major renovation. The definitions are in line with the definitions set out in the previous Energy Performance of Buildings Directive.

Section 4 lays down the relationship of the Act with other legislation. Under the section, the local building supervision authority's duties in monitoring compliance with construction permits are laid down in the Construction Act (751/2023). Under the same section, the requirements for publicly accessible recharging points are laid down in Regulation (EU) 2023/1804 of the European Parliament and of the Council on the deployment of alternative fuels infrastructure and repealing Directive 2014/94/EU (Alternative Fuels Infrastructure Regulation, AFIR) (see also section 9).

Section 5 of the Act stipulates that new buildings must be equipped with recharging points or recharging point capabilities for electric vehicles. Under the section, parties undertaking a construction project must ensure that electric vehicle recharging points or recharging point capabilities are designed and installed adjacent to the building in accordance with this Act if the building is a new building subject to a construction permit pursuant to section 42 of the Construction Act.

Under subsection 2 of the same section, a new residential building with more than four car parking spaces must be fitted with recharging point capabilities so that a recharging point can be installed in each parking space at a later date. In accordance with subsection 3 of the same section, a new non-residential building with more than 10 car parking spaces must also be fitted with one high-power recharging point, or alternatively: (1) at least one normal-power recharging point if there are 11–50 car parking spaces; (2) at least two normal-power recharging points if there are 51–100 car parking spaces; (3) at least three normal-power recharging points if there are more than 100 car parking spaces.

Under section 5, subsection 4 of the Act, in addition to what is provided in subsection 3, recharging point capabilities must be installed in at least 50 per cent of the car parking spaces adjacent to a new non-residential building with 11–30 car parking spaces. If there are more than 30 car parking spaces, recharging point capabilities must be installed in at least 20 per cent of the car parking spaces, provided that at least 15 car parking spaces have recharging points. If a recharging point is installed in a car parking space, it meets the requirement for the recharging point capability for the car parking space. According to section 5, subsection 5 of the Act, the obligations of the section apply to car parking spaces located in the building or on the property on which the building is located.

Section 6 of the Act stipulates that buildings undergoing major renovation must be equipped with recharging points or recharging point capabilities for electric vehicles. Under subsection 1 of the section, parties undertaking a construction project must ensure that electric vehicle recharging points or recharging point capabilities are designed and installed adjacent to the building in accordance with this Act if the major renovation is subject to a construction

permit pursuant to section 42 of the Construction Act. Under subsection 2 of the section, a residential building undergoing major renovation with more than four car parking spaces must be fitted with recharging point capabilities so that a recharging point can be installed in each parking space at a later date.

In accordance with subsection 3 of the section, a non-residential building undergoing major renovation with more than 10 car parking spaces must be fitted with one high-power recharging point, or alternatively: (1) at least one normal-power recharging point if there are 11–50 car parking spaces; (2) at least two normal-power recharging points if there are 51–100 car parking spaces; (3) at least three normal-power recharging points if there are more than 100 car parking spaces.

Under subsection 4 of the section, in addition to what is provided in subsection 3, recharging point capabilities must be installed in at least 50 per cent of the car parking spaces adjacent to a non-residential building with 11–30 car parking spaces. If there are more than 30 car parking spaces, recharging point capabilities must be installed in at least 20 per cent of the car parking spaces, provided that at least 15 car parking spaces have recharging points. If a car parking space is equipped with a recharging point, it meets the requirement for the recharging point capability of the car parking space.

Subsection 5 of the section also further specifies the scope. The provisions of subsections 2 to 4 apply to buildings in which: (1) the car parking spaces are located in the building, and the renovation covers the car parking spaces or the electrical system of the building; or (2) the car parking spaces of the building are located on the property on which the building is located, and the renovation covers the car parking spaces or the electrical system of the parking spaces.

Section 7 of the Act provides for the equipping of existing buildings with recharging points for electric vehicles. It stipulates that the owner of an existing non-residential building with more than 20 car parking spaces in the building or on the property must ensure that at least one recharging point is installed by 31 December 2024 at the latest.

Section 8 of the Act stipulates that multi-storey car parks must be equipped with recharging point capabilities for electric vehicles. Under the section, parties undertaking the construction of a new multi-storey car park intended to provide parking for one or more residential buildings must ensure that electric vehicle recharging point capabilities are designed and installed in the car park so that a recharging point can subsequently be installed in each car parking space if the construction project is subject to a construction permit pursuant to section 42 of the Construction Act. Under subsection 2 of the section, parties undertaking the major renovation of a new multi-storey car park intended to provide parking for one or more residential buildings must ensure that electric vehicle recharging point capabilities are designed and installed in the car park so that a recharging point can subsequently be installed in each car parking space if the renovation project is subject to a construction permit pursuant to section 42 of the Construction Act.

Section 9 of the Act lays down the requirements for recharging points and recharging point capabilities for electric vehicles. Under the section, the recharging points referred to in sections 5 to 8 must be normal-power recharging points or high-power recharging points with the technical characteristics specified in Annex II to the Alternative Fuels Infrastructure Regulation. Subsection 2 of the section also stipulates that the recharging point capabilities referred to in sections 5, 6 and 8 must be such that a recharging point complying with the

technical specifications referred to in subsection 1 can be installed in the car parking space at a later date. Under subsection 3, the recharging points referred to in sections 5 to 7 may also be publicly accessible recharging points within the meaning of Article 2(45) of the Alternative Fuels Infrastructure Regulation.

Section 9, subsection 4 also lays down accessibility requirements for car parking spaces. Under the subsection, at least one of the recharging points referred to in section 5, subsection 3 and section 6, subsection 3 that are available for public use must be installed in a parking space that is at least 3.6 metres wide and at least 5.0 metres long.

The Alternative Fuels Infrastructure Regulation (AFIR) is central in terms of the technical requirements for recharging points, as section 9 of the Recharging Point and Automation Act refers to the specifications of the Regulation. The Act on the Distribution of Alternative Fuels for Transport (475/2024) specifies and complements the AFIR and its national implementation. The objective of the AFIR is to achieve a comprehensive and interoperable distribution infrastructure for alternative fuels in the Union, in particular for road vehicles, trains, vessels and stationary aircraft. Article 21 of the AFIR lays down common technical specifications. Among other goals, the purpose of the technical requirements is to ensure that alternative propulsion vehicles on the market can be recharged or refuelled at any publicly available recharging or refuelling point. Under Article 21(1) of the AFIR, the technical specifications set out in Annex II are applied. Annex II contains technical specifications for recharging points for road transport electricity supply, communication exchange in electric vehicle recharging points, hydrogen supply for road transport vehicles, methane for road transport, electricity supply for maritime transport and inland navigation, hydrogen and methanol bunkering for maritime transport and inland navigation, liquefied methane refuelling points for maritime transport and inland navigation, and fuel labelling.

The Electrical Safety Act (1135/2016) ensures the safe construction of electrical installations and the safe use of electrical equipment and installations. The Act also implements the Directive 2014/30/EU of the European Parliament and of the Council on the harmonisation of the laws of the Member States relating to electromagnetic compatibility (recast) and the Directive 2014/35/EU of the European Parliament and of the Council on the harmonisation of the laws of the Member States relating to the making available on the market of electrical equipment designed for use within certain voltage limits (recast). The key substantive provision on electrical safety is set out in section 6 of the Electrical Safety Act. To ensure electrical safety and prevent faults, this section sets out general requirements regarding how electrical equipment and installations must be designed, constructed, manufactured and repaired, and be maintained and used. The premise of the Act is that electrical equipment and installations must not pose a risk to life, health or property. Furthermore, electrical equipment or installations must not cause unreasonable electrical or electromagnetic interference. Under section 31 of the Electrical Safety Act, electrical installations must also comply with the essential safety requirements. The essential safety requirements concern protection against electric shocks, fire, heat and other adverse effects, requirements for special equipment and special conditions, the compatibility of different types of equipment, and other essential design requirements. The requirements also apply to the necessary markings and documentation. Under section 32 of the Act, electrical installations are considered to fulfil the essential safety requirements if they are designed, constructed and repaired in accordance with the standards or publications referred to in section 33 of the Electrical Safety Act, the compliance of which with the essential requirements has been confirmed in accordance with section 33 of the Act. Under section 34, the standards may be derogated from if an equivalent level of safety can otherwise be achieved.

According to section 53 of the Electrical Safety Act, electrical work means the repair and maintenance of electrical equipment, and the construction, repair and maintenance of electrical installations. Under section 54 of the Act, the basic requirement for performing electrical work is that the person carrying out the work must be familiar with or instructed in the task and the relevant electrical safety requirements. The conditions for performing electrical work are laid down in section 55 of the Act, and operators must ensure that the conditions are fulfilled. The operator must also have a designated person in charge of electrical safety, namely an electrical work supervisor. The electrical work supervisor is responsible for meeting the safety requirements. The duties of the electrical work supervisor are set out in section 59 of the Act.

When designing electric vehicle recharging points and recharging point capabilities, attention must be paid to the requirements of the Electrical Safety Act, ensuring that electrical work is performed by a competent person, and that electrical equipment or installations meet the requirements of the Electrical Safety Act. It must also be ensured that the capacity of the main switchboard is sufficient.

The requirements for measuring instruments and methods, and the procedures related to their verification, are laid down in the Measuring Instruments Act (707/2011). Under the Measuring Instruments Act, the manufacturer, authorised representative, importer and distributor of a measuring instrument are responsible for ensuring that a measuring instrument intended for use in accordance with the Measuring Instruments Act complies with the requirements of the Measuring Instruments Act. The user of measurement results is responsible for ensuring that the measuring instrument, when used in accordance with the Measuring Instruments Act, meets the relevant requirements. If a measurement result is used, the party using it is responsible for ensuring that a suitable, compliant measuring instrument is used. The person using the measuring instrument is also responsible for ensuring that the use of the measuring instrument is regularly monitored and its reliability verified. When installing and operating recharging capabilities for electric vehicles, the requirements set out in the Measuring Instruments Act regarding the reliability of electricity metering must be considered where the metering results are used as the basis for billing.

Section 10 of the Recharging Points and Automation Act provides for an exemption for electric vehicle recharging points and recharging point capabilities. The provisions of section 5, subsections 3 and 4, section 6, subsections 3 and 4, and section 7 do not apply to the installation of recharging points or recharging point capabilities adjacent to buildings owned and occupied by microenterprises as defined in Commission Recommendation 2003/361/EC concerning the definition of micro, small and medium-sized enterprises.

Chapter 4 of the Recharging Points and Automation Act sets out provisions concerning the authorities responsible for electric vehicle recharging points and the supervision thereof. The recharging point capabilities of existing buildings are supervised by the Finnish Transport and Communications Agency Traficom, whereas recharging points installed under construction permits are supervised by the local building control authorities.

Under section 17, subsection 1 of the Act, Traficom is responsible for ensuring compliance with section 7, which means ensuring that existing buildings are equipped with electric vehicle recharging points in accordance with the Act. Section 18 of the Act provides for Traficom's right to carry out inspections. Under the section, the Traficom has the right, for the purposes of monitoring compliance with section 7, to enter any area, flat or other premises to which access is necessary for the purposes of monitoring, and to carry out inspections there in

connection with such monitoring. However, the right of inspection does not extend to premises used for permanent housing. Inspections must comply with section 39 of the Administrative Procedure Act (434/2003). Under section 19 of the Recharging Points and Automation Act, if the owner of a building fails to comply with the obligation laid down in section 7 to install a recharging point, Traficom must require the owner to rectify the situation within a specified deadline. If the recharging point is not installed within the deadline, Traficom shall order the building owner to install the recharging point within a new deadline set by Traficom. Section 20 of the Act also provides for penalty payments and notice of enforced compliance, and under this section, Traficom may enforce an order issued pursuant to section 19 by imposing a penalty payment or a notice of enforced compliance, which means performing the measure at the defaulter's expense.

Under section 7, subsection 2 of the Act, the local building supervisory authority is responsible for monitoring compliance with sections 5, 6, 8 and 11 to 13 in connection with the supervision of projects subject to a permit under the Construction Act. The Construction Act applies to this supervision. However, in monitoring compliance with the Recharging Points and Automation Act, the local building supervision authority may only use the coercive measures referred to in sections 147 and 148 of the Construction Act.

3.1.2 Number of electric vehicles and recharging points in Finland in 2025

The passenger car fleet in Finland has become increasingly electric in recent years, and at the same time, the need for recharging points is growing. Recharging points are established partly on market terms, driven by demand, partly through national support and partly as a result of legal requirements. There is no comprehensive information about the current total number of recharging points. Their number can be estimated in three ways: (1) by assessing the number of recharging points and capabilities created annually under current legislation; (2) by assessing the number of recharging points sold; and (3) by assessing the number of electric vehicles in use. In an estimate based on the vehicle fleet, it is difficult to account for factors such as the proportion of motorists who recharge their cars using a protective contact socket intended for temporary use, and the proportion of cars being recharged while parked on the street, for example. Forecasts of the electrification of transport are also subject to uncertainties, and the construction of recharging points and the electrification of transport affect one another. It would not be reasonable to assume that the number of installed recharging points will automatically equal that of electric cars without any legal obligations, as the installation of recharging points will lower the threshold for buying an electric car and accelerate the electrification of transport.

According to information received from the Finnish Electrotechnical Trade Association, around 82 000 'basic' recharging devices with around 92 500 recharging points were sold between 2021 and 2024. The figures do not directly reveal the kind of properties the equipment was installed in, but it appears that most of the equipment was sold to residential properties. The number includes only standard recharging devices with a power of up to 22 kW, which means the number does not include protective contact sockets or direct current recharging devices.

Further information about the number of existing recharging points can be obtained from the statistics of the grants awarded for recharging points by the Centre for State-Subsidised Housing Construction (formerly the Housing Finance and Development Centre of Finland Ara) for between 2018 and 2024. A total of approximately EUR 62 million in grants was awarded, and around 97 000 recharging points or recharging capabilities were installed, of

which approximately 94 000 were installed on residential properties, and the remainder in workplace car parks. Around 65 000 of the subsidised recharging points and capabilities were installed between 2021 and 2023. According to the Finnish Electrotechnical Trade Association's statistics, approximately 77 000 recharging points were sold during the same period, suggesting that a significant proportion of these recharging devices were purchased with financial support. At the same time, as a rule, the grant was not available for the installation of recharging points for non-residential buildings required by law, and it is estimated that up to 84 000 were installed by 2025 due to the current legal obligation. Some of these statutory installations also included high-power recharging points, and according to an electric transport status report by Technology Industries of Finland, around 2 800 of these had been installed by the end of 2023.

If the majority of standard recharging points in the sales statistics had been installed in residential properties, the standard recharging points built without support before the third quarter of 2024 (approximately 13 000 units) would mainly consist of points built for residential properties without statutory requirements or support. However, this estimate would suggest that, in light of sales figures, the requirement under the current Act for recharging points in buildings with more than 20 parking spaces – which entered into force at the start of 2025 – was hardly implemented in advance. The reality is likely to lie somewhere in between: while the future requirements under current legislation have largely not yet been fulfilled in the existing building stock, not all financially supported standard recharging points have been installed on residential properties. It can therefore be estimated that the purely market-driven demand for recharging equipment is significantly lower than the demand calculated based on the legislation.

Electric cars account for 10.3 per cent of the car fleet in Finland. At the start of 2025, there were 285 146 electric cars in Finland, of which 118 297 were fully electric, representing 41 per cent of all electric cars (electric transport status report for Q4/2024, 24 January 2025, Sähköisen liikenteen yhdistys [an association for electric transport]). The number of electric cars is estimated to reach a total of 925 584 in 2030, of which 626 771 will be pure electric vehicles (Traficom memorandum on the distribution infrastructure for alternative propulsion systems in road transport in 2023, 12 April 2024). At the end of 2024, the number of public recharging points was 15 890 (electric transport status report for Q4/2024, 24 January 2025, Sähköisen liikenteen yhdistys [an association for electric transport]). Between 2018 and 2024, around 97 000 recharging points were installed with financial support, meaning that the majority of recharging points are not publicly accessible. Based on the electric vehicle fleet at the beginning of 2025, supported recharging point installations and the 2030 vehicle fleet forecast, it can be estimated that the number of recharging points will be around 315 000 in 2030.

3.1.3 Bicycle parking in buildings

Bicycle parking spaces associated with buildings can be categorised according to both the quality and level of equipment of the facilities and their purpose of use. Factors related to quality and equipment level include racks, locking mechanisms and weather protection. The categorisation related to purpose is largely related to the duration of parking. Parking facilities designed for different purposes have different requirements in terms of quality and equipment. The Rakennustieto (RT) Building Information File concerning the parking and storage of bicycles categorises the parking of bicycles on residential properties into three types: (1) parking-type short-term storage; (2) longer-term storage overnight or for a few days; and (3)

storage over winter. In non-residential buildings, bicycle storage and parking is typically of a short-term nature or, in the case of workplace properties, may last for a few days.

The number of bicycle parking and storage spaces is currently regulated in land use planning, in which towns and cities have set various volume and quality requirements for parking. In addition, the RT Building Information File published by Rakennustieto, which provides guidance on construction, includes the aforementioned information file concerning bicycle parking and storage. The recommended volumes set out in the file are higher than the requirements of the Directive in some cases, and possibly lower in others. For example, it is recommended that the number of bicycle parking spaces on workplace properties should be 40 per cent of the number of employees. Under the Energy Performance of Buildings Directive, the requirement for non-residential buildings is 15 per cent of the average user capacity or 10 per cent of the total user capacity. Table 3 summarises some recommendations and guidance values for the number of bicycle parking spaces in different types of buildings. Despite the different units and definitions, it can be noted that the recommended number of bicycle parking spaces in more recent sources is slightly higher than before.

Table 3. Guidelines and recommendations for bicycle parking spaces in various properties.

	RT Building Information File (2017)	Liikenne ja Väylät II [Transport planning and infrastructure] (2005)
Residential property	1 bps per 30 m ² of gross floor area of storage space and 0.5 bps per 30 m ² of gross floor area of parking space	-
Shops and shopping centres	2.5 bps per 100 m ² of gross floor area	1 bps per 40 m ² of gross floor area (convenience stores) 1 bps per 100 m ² of gross floor area (hypermarkets and department stores)
Libraries, museums, concert halls, etc.	0.25 bps per seat and 0.4 bps per employee	30–50 bps (libraries) 10–20 bps (exhibition spaces and museums) 1 bps per 10 seats (meeting rooms)
Sports facilities	1 bps per pupil and 0.4 bps per employee	1–2 bps per 3 pupil/student places
Comprehensive schools and general upper secondary	1 bps per pupil and 0.4 bps per employee	1–2 bps per 3 pupil/student places

schools		
Workplace properties	0.4 bps per employee	1 bps per 90 m ² of gross floor area (office buildings)

bps=bicycle parking space

The bicycle parking spaces constructed in the courtyards of new buildings are often permanently installed front wheel racks or stands that allow the bicycle frame to be secured. According to the RT Building Information File, it is recommended that residential properties provide bicycle parking spaces in a roofed area or under a canopy, with some spaces located indoors for long-term parking. In addition to the number and location of bicycle parking spaces, the quality of bicycle racks is a key factor in the success of bicycle parking. The use of traditional low-cost front wheel racks is decreasing due to the fact that they do not sufficiently support the bicycle, the bicycle frame cannot be secured, and the front rim and disc brake can be damaged in horizontal racks.

The availability of bicycle parking can encourage people to cycle more. It is difficult to assess the impact directly based on bicycle parking spaces, as study results vary significantly, and the choice of means of transport is influenced by many other factors besides parking (Bicycle parking: A systematic review of scientific literature on parking behaviour, parking preferences, and their influence on cycling and travel behaviour, Heinen and Buehler, 2019).

3.1.4 Installation of recharging points in housing companies

The Energy Performance of Buildings Directive requires Member States to provide for measures to simplify, streamline and accelerate the procedure for the installation of recharging points in new and existing, residential and non-residential buildings, especially of co-owners' associations, and remove regulatory barriers, including permitting and approval procedures from public authorities without prejudice to the property and tenancy law of the Member States. In Finland, the main framework for examining this issue is the legislation on housing companies.

Decision-making in housing companies is governed by the Limited Liability Housing Companies Act (1599/2009, hereinafter the 'Housing Companies Act'). Under chapter 1, section 1 of the Housing Companies Act, a limited liability housing company is a limited liability company whose purpose, as provided in its articles of association, is to own and possess at least one building or a part of a building in which at least half of the combined floor area of the property or properties is, under the articles of association, reserved for use as residential properties possessed by the shareholders. On its own or with other shares, each share of the limited liability housing company confers a right of possession to a property specified in the articles of association or to some other part of a building or real estate in the possession of the housing company.

The Housing Companies Act does not stipulate which housing-related services must be provided or authorised by a housing company. The question of the construction of electric vehicle recharging points must therefore be assessed based on the Act's general provisions concerning the equal treatment of shareholders, alterations work and modernisation. Under chapter 1, section 10 of the Housing Companies Act, all shares confer equal rights in the company, unless the articles of association provide otherwise. The general meeting, the board of directors or the property manager may not make decisions or take other measures that are

conducive to conferring an undue benefit to a shareholder or another person at the expense of the housing company or another shareholder.

Under chapter 6, section 31 of the Housing Companies Act, a general meeting may, by a majority vote, decide to carry out modernisations financed by charges for common expenses only if they match current standard requirements, i.e. are, so to speak, standard practice. In addition, the shareholders' obligation to pay must remain reasonable. The provision is intended to protect shareholders. Its purpose is to limit the possibility for the majority to undertake projects, at the expense of all stakeholders, which are not considered to be part of the level of equipment regarded as standard in a residential property. What is considered standard at any given time is subject to change over time. In assessing what is considered standard, guidance is provided by the equipment level of new housing production, building regulations and developments in society, for example. Amenities that were once unusual and have become commonplace over time include telecommunications technology (internet connection) and changes in heating systems, such as geothermal heating.

The installation of electric vehicle recharging points is becoming increasingly common in housing companies. The Directive imposes obligations regarding the installation of electric vehicle recharging points and capabilities in residential and other buildings. In practice, the increasing prevalence of recharging points may affect the assessment of when their implementation is considered to be a standard modernisation that can be resolved by the general meeting by a simple majority, including the collection of charges as common expenses from all shareholders. This means that if the recharging of electric cars were to be regarded as a current standard requirement, and the resulting financial obligation on shareholders were not to be considered unreasonable, the general meeting could decide, by a majority of the votes cast at the meeting, to upgrade the property's electrical network and to purchase recharging equipment. However, the consideration of the principle of equal treatment under the Housing Companies Act in decision-making concerning modernisations means that a decision on a modernisation that is in itself standard may be contrary to the principle of equal treatment if the distribution of costs among the shareholders clearly does not match how the modernisation will affect the development of the value of each shareholder's flat (HE 24/2009 vp, p. 56).

In practical terms, the way in which a company manages its car parking spaces may therefore be relevant when assessing compliance with the principle of equal treatment. If the conditions laid down by law regarding the standard nature of modernisation work and the shareholders' obligation to pay are not met, a decision may be taken to install a recharging point in such a way that, to cover the costs, a fee is charged only to those shareholders who have consented to it and who use the service, as well as to the new owners of those shares.

Conversely, if car parking spaces are owned by shareholders as separate parking space shares, for example, the costs of the recharging point and the necessary cabling should be borne by the owners of those parking space shares. In such a case, the general meeting must decide on the matter by a double majority in accordance with chapter 6, section 32, subsection 5 of the Housing Companies Act. In addition to the majority decision, the project must be supported by a majority of the votes cast by the parking space shareholders at the general meeting. The availability of electric vehicle recharging facilities significantly increases the value of parking space shares; for this reason, the costs of installing the recharging infrastructure, insofar as they serve exclusively the parking space shares, must be allocated to the relevant shareholders for payment in the manner described above.

The aim of the Housing Companies Act is to ensure that the housing services provided by the company are based on genuine need, and that the costs of providing these services are shared fairly. The Housing Companies Act also provides for the responsibility for maintenance. Under chapter 4, section 3 of the Housing Companies Act, a shareholder must maintain the interior of their flat, and under chapter 4, section 2 of the Act, the company is responsible for maintenance insofar as it does not fall within the shareholder's responsibility.

The need for amending the Housing Companies Act is being assessed in the ongoing project on the revision of the Act (OM119:00/2023). The government proposal for an act amending the Housing Companies Act and certain related acts is estimated to be presented in the spring of 2026.

3.2 Building automation and control systems

3.2.1 Key legislation

Under section 37, subsection 1 of the Construction Act, the construction products and building services systems used in a building, as well as their control and measurement systems, must be such that, when the building and its systems are used for their intended purpose, energy consumption and power demand remain low, and energy consumption can be monitored. Under section 39, parties undertaking a construction project must also ensure that the building is designed and constructed in a manner that is appropriate for its intended purpose to be ecological in terms of life cycle characteristics and to have a long planned technical service life. Under the same section, particular attention must be paid to the durability of the foundation and load-bearing structures, and to the service life, usability, maintenance, adaptability and reparability of the building and its facilities, building elements and technical systems, as well as the dismantling and reusability of building components. Under section 140 of the Construction Act, a building owner must keep the building and its energy supply systems in such condition as to meet the energy performance requirements, taking into account the way in which the building is built.

Chapter 3 of the Recharging Points and Automation Act lays down provisions on building automation and control systems. Sections 11 to 13 of the Act provide for the equipping of different buildings with automation and control systems as follows:

- section 11: new buildings;
- section 12: buildings undergoing renovation and alteration; and
- section 13: existing non-residential buildings.

An automation and control system must be installed in the cases referred to in sections 11 and 12 when a construction permit is sought for a new building or for renovation and alteration work on a building. The provisions also stipulate that an automation and control system must be installed based on the nominal capacity of an air-conditioning system or a combined air-conditioning and ventilation system: the system must be installed in a building in which the effective rated output of the heating system or combined space heating and ventilation system exceeds 290 kW, and in a building in which the effective rated output of the air-conditioning system or combined air-conditioning and ventilation system exceeds 290 kW.

The requirement in section 13 of the Act concerning existing buildings applies to non-residential buildings. It requires building owners to ensure that an occupied non-residential building in which the effective rated output of the heating system or combined space heating and ventilation system exceeds 290 kW is equipped with a building automation and control system by 31 December 2024 at the latest. Building owners must also ensure that an occupied non-residential building in which the effective rated output of the air-conditioning system or combined air-conditioning and ventilation system exceeds 290 kW is equipped with a building automation and control system by 31 December 2024 at the latest.

In addition, the Act sets out requirements for building automation and control systems, as well as exceptions to the obligation to install them. Under section 14 of the Act, an automation and control system must be capable of: (1) continuously monitoring, logging and analysing energy consumption and allowing for adjusting energy use; (2) benchmarking the building's energy efficiency, detecting losses in efficiency of technical building systems, and informing the person responsible for the facilities or technical building management about opportunities for energy efficiency improvement; and (3) allowing communication with connected technical building systems and other appliances inside the building, and being interoperable with technical building systems across different types of proprietary technologies, devices and manufacturers.

Under section 15 of the Act, in buildings undergoing renovation and alteration work and existing buildings, an automation and control system need not be provided if: (1) the installation of the building automation and control system is not technically or economically feasible; (2) the heating or air-conditioning system of the building is not a system that can be controlled by automation; or (3) the requirements of section 14 can be met by a combination of several systems, which may also be connected to several buildings.

Section 15a of the Act also provides for the exemption of certain buildings from the inspection requirements. Under the section, the inspection requirements laid down in Articles 14(1) and 15(1) of the Energy Performance of Buildings Directive do not apply to: (1) buildings that meet the requirements of Articles 11 to 14; and (2) residential buildings that have: (a) the functionality of continuous electronic monitoring that measures systems' efficiency and informs building owners or managers when it has fallen significantly, and when system servicing is necessary; and (b) effective control functionalities to ensure optimum generation, distribution, storage and use of energy.

3.2.2 Automation and control systems in buildings

The technology used in modern buildings and the needs of building users require that new buildings, and particularly those yet to be built, must be equipped with automation and control systems. In Finland, automation systems are common and, except for detached and semi-detached houses in particular, their level is good. In Finland, it is common to use centralised heating and ventilation systems, which makes automation and control systems readily available. In large buildings in which automation and control systems are not used, there are generally operational reasons that limit the use of such systems.

In general, automation and control systems control the heating, cooling, ventilation and lighting of a building. The systems' control accuracy varies from equipment level to service area level, but the main energy consumption targets are controlled by automation systems. These systems can manage energy consumption according to actual needs and avoid unnecessary energy use while ensuring the quality of the indoor environment in line with the

building's intended use. At different quality levels, the systems may include different features, such as readiness for demand response, predictive control and user-specific control.

In Finland, it is standard practice to fit new and renovated buildings with automation and control systems. The building stock includes a number of older properties that do not make use of automation and control systems. In accordance with the requirement set out in section 13 of the Recharging Point and Automation Act, an automation and control system must be installed in some of these buildings by 31 December 2024 at the latest. As the life cycle of building services is shorter than that of building themselves, upgrades to building services increase the number of automation and control systems on market terms.

4 Proposals and their impacts

4.1 Main proposals

The proposal recommends amending the Act on Equipping Buildings with Electric Vehicle Recharging Points and Recharging Point Capabilities and Automation and Control Systems. It proposes to align the obligations of the Act with the recast Energy Performance of Buildings Directive. These obligations would be incorporated into national legislation, exercising national discretion, keeping the requirements to the minimum, and aligning with the Government Programme so that the increase in costs incurred by building owners as a result of these obligations remain reasonable.

The number of electric vehicle recharging points would be increased to meet the minimum requirements of the Directive. In addition, buildings would be subject to legal requirements regarding the number of bicycle parking spaces. It is proposed that the definition of an electric vehicle recharging point be clarified, and that new definitions be incorporated into the Act.

It is proposed that requirements for the installation of building automation and control systems be added to the Act. A new requirement would be the installation of automation and control systems in new residential buildings and those undergoing major renovation, provided this is economically, technically and functionally feasible. In addition, automatic lighting controls should be installed in buildings, provided this is technically and economically feasible. As another new requirement, automation systems must be capable of monitoring the quality of the indoor environment.

4.2 Principal impacts

4.2.1 Electric vehicle recharging points and bicycle parking spaces

4.2.1.1 Economic impact

An estimate of the number of recharging points, their different types of capabilities and costs under the Directive is presented in Table 4. In addition to these costs, those related to the requirements for buildings owned by public bodies to be implemented by 2033 should be included in the total costs arising from the Directive.

The annual impacts and costs would be highest in the first year, when non-residential buildings with more than 20 car parking spaces would need to be brought into line with the requirements set for 2027 (or 2029). Without the exemption for low-value buildings, the number of completed recharging points is expected to be around 11 780 per year. An

estimated 190 170 new ducting systems would be installed in the first year, and 40 020 per year in subsequent years. The annual cost in the first year would be approximately between EUR 157 million and 210 million, and between EUR 94 million and 126 million in subsequent years. In assessing the minimum costs of implementing the Directive, it is assumed that for existing non-residential buildings with more than 20 car parking spaces, only ducting will be installed, without any completed recharging points, as it is estimated that installing ducting in 50 per cent of car parking spaces is usually less expensive than installing recharging points in 10 per cent of parking spaces. Requiring completed recharging points instead of ducting would lead to an estimated cost increase of up to 35 per cent for these buildings. In terms of minimising cost impacts, it is therefore justified to allow building owners to select the most appropriate solution.

By 2030 (2026–2030), the cost impact of the minimum implementation of the Directive is expected to be approximately between EUR 440 million and 590 million. Most of the annual costs would affect non-residential buildings, in which ducting, pre-cabling and completed recharging points would have to be installed, totalling approximately EUR 65 to 89 million per year. Pre-cabling, which has been added to the recast Directive, is significantly more expensive than the previous requirement for recharging point capability, i.e. ducting, as it is also considered to include costs related to distribution boards. In the case of residential buildings, up to 80 per cent of the cost impact stems from the requirement to install pre-cabling in half of the car parking spaces instead of ducting.

Table 4. Estimated costs arising from the recharging point obligations in the first year.

Building types	Number of buildings subject to the obligation per year			Number of measures per year			Total cost (million EUR per year)	
	New	Undergoing major renovation	Existing	Ducting	Pre-cabling	Recharging point	Min	Max
Residential buildings, > 3 car parking spaces - new and undergoing major renovation	1 310	1 550	0	15 170	15 170	1 310	29	37
Non-residential buildings - new and undergoing major renovation, > 5 car parking spaces	2 780	2 190	0	24 850	24 850	10 467	65	89
- existing, > 20 car parking spaces (first year only)			50 960	150 150			63	84
total	4 090	3 740	50 960	190 170	40 020	11 777	157	210

Building types	Number of buildings subject to the obligation per year						Number of measures per year		Total cost (million EUR per year)	
	Undergoing major renovation			Ducting	Pre-cabling	Recharging point	Min	Max		
	New	Existing	Existing							
New and undergoing major renovation										
Residential buildings, > 3 car parking spaces	1 310	1 550	-	15 170	15 170	1 310	29	37		
Non-residential buildings, > 5 car parking spaces	2 780	2 190	-	24 850	24 850	10 467	65	89		
Existing										
> 20 car parking spaces (first year only)	-	-	50 960	150 150	-	-	63	84		
total	4 090	3 740	50 960	190 170	40 020	11 777	157	210		

The Directive introduces an additional requirement for public buildings, stipulating that by 2033, half of the car parking spaces in buildings with more than 20 parking spaces must be fitted with pre-cabling. The additional costs associated with this requirement are estimated in Table 5. The total cost of these additional requirements for the public sector is estimated to be approximately between EUR 46 million and 51 million. The cost impact on public sector buildings will be significant, as the required pre-cabling involves not only ducting and cabling but also other measures and affects as many as half of the car parks.

Table 5. Estimated costs arising from the pre-cabbling of buildings owned by a public body.

Owner	Total buildings	buildings subject to the obligation on 1 January 2033	Total cost (million EUR)	
			Min	Max
the state (Senate Properties and Defence Properties Finland)	2 803	132	1.1	1.3
municipalities (including unincorporated municipal enterprises)	26 455	3 844	33.1	36.4
wellbeing services counties	9 663	1 404	12.1	13.3
total	38 921	5 381	46.3	51

The annual costs of recharging points under the existing legislation are only between EUR 17 and 25 million and thus significantly lower than those under the new Directive. If these costs are deducted from the estimated costs of the recast Directive, this results in costs of between EUR 140 and 185 million for the first year and between EUR 355 and 465 million for the period between 2026 and 2030. This estimate therefore represents the additional costs for the entire building stock by 2030 as a result of implementing legislation complying with the minimum requirements of the recast Directive. In addition to these costs, by 2033, the public sector will incur a total additional cost of approximately EUR 46 to 51 million through the extensive obligations related to pre-cabbling.

The figures presented here were calculated without taking into account the derogations permitted by the Directive, such as in the case of buildings of negligible value. The proposal includes the introduction of a cost exemption under which the requirements for recharging points will not apply if the cost of installing recharging points and ducting exceeds 10 per cent of the total cost of major renovation of the building. This will reduce the costs significantly. It can be estimated that, by making use of the derogation permitted by the Directive, it is likely that a significant proportion of the existing building stock, which is in poor condition and may contain a large number of parking spaces, could be excluded from the requirements. In the impact assessment, no data was available about the number of buildings in which the cost of implementing recharging points would exceed 10 per cent of the value of major renovation.

For residential properties, the RT Building Information File recommends 1 bicycle storage space per 30 square metres of floor area, and for shopping centres, 2.5 spaces per 100 square metres of floor area. The Directive's provisions concerning residential buildings requires the provision of two bicycle parking spaces per residential building unit in new buildings and those undergoing major renovation. As some of the spaces may well be outdoor short-term storage spaces, any increase required by the Directive is unlikely to result in a significant additional cost for residential properties compared to current recommendations and practices.

The potential need for additional bicycle parking may pose challenges in older residential properties undergoing major renovation, which may not have their own courtyard, or the courtyard is reserved for car parking. This will make it difficult to arrange additional space for bicycle parking, and in interpreting compliance with the requirements, it may not be possible to introduce stricter conditions than those laid down in the Directive. This situation is also recognised in the Directive itself, which allows for flexibility, and this flexibility will also be implemented at national level: 'Where, in the case of major renovation, ensuring two bicycle parking spaces for every residential building unit is not feasible, Member States shall ensure as many bicycle parking spaces as appropriate.'

The recast Energy Performance of Buildings Directive increases the costs for property owners by several times compared to the legislation in force. However, the positive effects of these requirements – namely the expansion of the recharging infrastructure for electric vehicles – are proceeding at a significantly faster pace than before and what would be expected under market conditions.

The major challenge of the new requirements is that the least expensive implementation methods are unlikely to best serve real user needs in many locations. Particularly in the case of many non-residential buildings, demand for relatively slow standard recharging points may remain limited if visits to the property are typically of short duration. Property owners may also install recharging points that are more efficient than those required by the Directive and future legislation. However, the cost of these is significantly higher than that of standard recharging. The Directive does not allow flexibility in the number of recharging points on the grounds of building points that are more efficient than the minimum requirement.

The requirements of the Directive will also significantly increase the costs of major renovations and new construction of residential buildings compared to the current requirements. However, capabilities focusing on standard recharging points and their capabilities is more likely to serve the real user needs in these buildings as the electrification of transport progresses at the projected pace. For the same reason, it is also likely that some of the requirements for residential buildings might also be met on a market-driven basis.

The cost estimates do not include any costs that may arise for the electricity grid or the costs incurred by building owners in increasing the size of their electricity connection. As the Directive does not set clear requirements for the actual recharging power available at recharging points, the scale of these investments depends largely on the choices made by building owners. Regarding recharging capacity, the Directive states that the system must be dimensioned 'so as to enable the simultaneous and efficient use of the required number of recharging points'. There is also a mention that load management can be used. If recharging points compliant with the Directive are to meet actual user needs, it is clear that, in addition to the costs mentioned here, there will be significant additional costs incurred in both residential and other buildings.

Unlike the previous Directive, the recast Directive does not include the possibility of excluding micro, small or medium-sized enterprises from the scope. Section 10 of the Finland's Recharging Points and Automation Act currently in force excludes microenterprises from its scope. In the future, the recharging point obligations would therefore also apply to microenterprises. As a result, the costs incurred by microenterprises would be expected to increase significantly compared to the current situation. However, the recharging point requirements apply only to buildings with more than 20 car parking spaces, including in the case of existing buildings.

4.2.1.2 Impact on the activities of public authorities

Under the Recharging Points and Automation Act, Traficom is tasked with supervising the compliance of existing buildings with the requirements concerning electric vehicle recharging points. The number of buildings subject to Traficom's supervision would not increase as a result of the new obligations. Even at present, the requirements for recharging points apply to buildings with more than 20 car parking spaces.

Under the Construction Act, it is the responsibility of the local building supervision authority to process submitted construction permit applications and issue decisions on them. Building supervision is also the responsibility of the local building supervision authority. Even in the cases referred to in sections 5, 6 and 8 of the Act currently in force, anyone undertaking a construction project must ensure that the building is designed and installed with recharging point capabilities or recharging points in accordance with the Recharging Points and Automation Act. The new requirements regarding recharging points are not expected to create additional work for the building supervision authority, except during the initial phase, when guidelines must be updated, and the volume of advice provided is expected to increase.

With regard to the new parking space obligations, the building supervision authority's workload may be considered to increase to a limited extent when processing construction permits. However, the verification of compliance with the bicycle parking requirement in connection with construction permits would be a minor part of the process. At the beginning of implementation, guidance updates and the provision of additional advice may increase the workload to a limited extent.

4.2.1.3 Environmental impacts

The significance of recharging point capabilities – that is, pre-cabling, ducting and recharging points – for the increase in the number of electric vehicles, and the potential environmental impacts resulting from this, cannot be directly assessed. As it can be estimated that a purely market-based demand for recharging equipment will be significantly lower than the estimated demand resulting from legislation, the legal requirements will increase the number of recharging points to some extent and thus have a positive impact on the electrification of the transport sector, which will also have positive effects on the environment.

The environmental impact of rechargeable cars is usually assessed by considering the change in greenhouse gas emissions. A modern electric car with an average energy consumption of 20 kilowatt-hours per 100 kilometres produces carbon dioxide emissions of around 20 to 40 grams per kilometre in Finland. This is about one third of the emissions of an energy-efficient low-emission petrol or diesel-powered car, which are about 100 grams per kilometre.

According to a report by Motiva, the reduction in emissions from rechargeable vehicles will increase between 2020 and 2029, reaching approximately 0.5 million tonnes of carbon dioxide in 2029, based on the number of electric vehicles in the baseline scenario. Motiva's report estimates that the limited, intermediate and advanced options for implementing the Directive would result in greater reductions in carbon dioxide emissions.

Based on the baseline number of vehicles and mileage, Finland's annual electricity consumption would increase by 0.6 to 0.8 terawatt-hours. This figure is relatively small compared to Finland's total electricity consumption, which stood at 87 terawatt-hours in 2018.

Unnecessary recharging points divert resources away from other sustainability investments without delivering any environmental benefits. For this reason, there is no benefit in imposing excessive building requirements through legislation. It should also be noted that, given the pace of technological development, it is not advisable to become overly reliant on current recharging point technology or to invest in the wrong type of recharging points. Depending on the situation, a few high-speed recharging points may be a better option than dozens of slow standard recharging points that remain largely unused. Furthermore, that money will not be spent on more effective energy efficiency investments. Other environmental impacts such as exhaust emissions harmful to health (carbon monoxide, hydrocarbons, nitrogen oxides and particulate matter) and noise emissions were not assessed, even though the increasing prevalence of electric vehicles reduces these. Nor was the construction of recharging infrastructure outside properties assessed.

4.2.2 Automation and control systems

The automation obligation has also been included in the previous Act and would be extended to cover more buildings. According to a 2020 estimate, the new scope would include 59 260 buildings with a power demand of more than 70 kW, whereas the previous scope (290 kW) included 22 210 buildings. In Finnish construction practice, larger buildings are generally fitted with a comprehensive automation and control system, provided that this is technically and economically feasible, even without specific control under a directive. There are some older buildings that would become subject to the stricter requirement in terms of their capacity, which would bring forward the installation of the systems.

The significance of the automation obligation is minimal, as automation develops on a market-driven basis thanks to the achievable economic and functional benefits (Rakennusten energiatehokkuusdirektiivin muutosten kansallisen toimeenpanon vaikutusten selvitys ja arviointi [Study and assessment of the impacts of the national implementation of amendments to the Energy Performance of Buildings Directive], Finnish Environment Institute, 2020). The requirement for automation and control systems is subject to technical and economic feasibility, which is why the economic impact on top of the installation of market-driven systems remains limited.

The Directive sets out the performance requirements for automation and control systems, which largely correspond to a typical system in a new or renovated large building. A new requirement to note is the monitoring of indoor environmental quality. In the case of residential buildings, the Directive also requires the capacity to react to external signals and to adapt energy use. The other capacities mentioned in the Directive are typical in new and renovated large buildings, but the responsiveness of residential building systems to external signals is not typical in modern construction. In practice, the regulatory impact of the amended Directive therefore means that the upgrade cycle of existing automation and control

systems in large buildings will be shortened by a few years. In the case of semi-detached and detached houses, the regulation could also help increase the number of automation systems.

A comprehensive and functional building automation and control system can optimise energy consumption, reducing the need for purchased energy and directing consumption to times of cheaper and cleaner energy. Such systems can therefore be economically viable and reduce the environmental footprint. If the regulatory impact of the Directive only results in a moderate increase in the number of new automation and control systems installed, the environmental impact will also be limited. According to the 2020 report, the impact of the automation obligation at the time was minor (Rakennusten energiatehokkuusdirektiivin muutosten kansallisen toimeenpanon vaikutusten selvitys ja arviointi [Study and assessment of the impacts of the national implementation of amendments to the Energy Performance of Buildings Directive], Finnish Environment Institute, 2020). The same logic also applies to buildings included within the new limit of power demand, which means that the impacts of the automation obligation of the updated Directive can also be considered to be small.

5 Other options for implementation

5.1 Alternatives and their impacts

5.1.1 Implementation in accordance with the minimum requirements of the Directive

Under Article 1(3) of the Energy Performance of Buildings Directive, the requirements laid down in the Directive are minimum requirements and do not prevent a Member State from maintaining or introducing stricter measures, provided that such measures are compatible with Union law. In certain respects, Finland implemented the previous Energy Performance of Buildings Directive from 2018 more ambitiously than required by the Directive itself with regard to electric vehicle recharging points.

In implementing the recast Directive, it would be possible to establish more ambitious targets than those of the Directive to achieve climate and emissions reduction targets. However, in accordance with the Government Programme, Finland will implement the minimum obligations laid down in the Directive.

5.1.2 Scope of Article 14(2) of the Directive

As part of the preparation of the draft act, it was discussed whether Article 14(2) (category 2) could be interpreted as covering only those car parking spaces located inside a building, basically meaning in the basement or on the roof of the building. The preparatory group tasked with preparing the implementation of the Directive highlighted that to avoid wasted investments, safeguard building owners' constitutional rights, ensure clear regulations and guarantee fair regulatory control, the requirement for recharging points or ducting should only apply to car parking spaces located inside buildings. Such spaces would thus include those in a building's underground car park and on the roof, but not those in an adjacent car park. The national provision concerning Article 14(2) should therefore not include the term 'property' or a car park 'physically adjacent to a building', as these are not mentioned in Article 14(2) (see also Chapter 2.1).

5.1.3 Organisation of the supervisory duty

Under section 17 of the current Act, the Finnish Transport and Communications Agency Traficom has been the supervisory authority responsible for monitoring compliance with section 7 of the Act. Traficom's supervision covers a large number of buildings – 49 000 according to Motiva's estimate – which are located in different parts of Finland. This supervision almost always requires on-site visits. Traficom has pointed out that it is unable to carry out the supervision in practice due to a lack of resources. During inspections, Traficom must submit a request to the local building supervision authority, which creates a considerable amount of extra work. Furthermore, in the future, the division of supervisory responsibilities between Traficom and the building supervision authority may give rise to confusion, as the building supervision authority is responsible for supervising the recharging point requirements for new buildings at the construction permit stage, whereas Traficom is in charge of supervising existing buildings.

Traficom was considered to be the appropriate authority for monitoring compliance with section 7 of the Act in force, as it currently acts as the supervisory authority under the Alternative Fuels Infrastructure Regulation, supervising publicly accessible recharging points. It was therefore considered that the supervision of recharging points in existing buildings would strengthen Traficom's position as the authority responsible for supervising recharging points. The supervision was estimated to require approximately 0.5 to 1 person-years at Traficom between 2024 and 2030. An alternative would be to transfer the supervision task to the local building supervision authority. However, increasing the responsibilities of local authorities would result in additional costs for them, and the building supervision authority's duties have traditionally been linked mainly to the construction permit stage.

5.2 Means planned or implemented by other Member States

To be completed

[To be completed when further information about the implementation by other Member States is available. The implementation is in its early stages in several Member States. The implementation of the previous Directive regarding recharging points in other Member States is described in government proposal HE 23/2020 vp (from page 28 onwards)].

6 Feedback

The government proposal was open for consultation from xx xx to xx xx 2025. [to be complemented after the consultation process]

7 Provision-specific rationale

Section 1, Purpose of the act. Section 1 of the Act would be amended to refer to the recast Energy Performance of Buildings Directive currently in force. No other changes to the section would be made.

Section 2, Scope. The content of section 2, subsections 1, 2 and 4 of the Act in force would not be amended. The act would continue to provide for the equipping of buildings with electric vehicle recharging points and recharging point capabilities and automation and control

systems. The act would continue to apply only to buildings that use energy to maintain the indoor climate. The act applies to parking spaces adjacent to such buildings. In addition, the act would continue to exclude buildings occupied by the defence administration.

However, pursuant to section 2, subsection 3 of the current Act, sections 8, 9, 16, 17 and 21 to 23 also apply to multi-storey car parks intended to provide parking for one or more residential buildings, even if no energy is used in them to maintain the indoor climate. This has been an additional requirement arising from national legislation, which would now be removed from the act. However, multi-storey car parks and facilities may fall within the scope of the act if they are car parks that are physically adjacent to a building.

The scope of the Act in force is laid down separately for each provision. The transfer of all provisions concerning the scope to section 2 of the act would clarify the scope and shorten the other sections.

Under the new subsection 4, sections 5b, 5d, 6 and 6a apply to car parking spaces located inside or physically adjacent to a building. The car parks physically adjacent to buildings are defined in section 3 of the proposed act. According to the Act currently in force, the car parking spaces of existing buildings must be located in the building or on the property. The scope would therefore be clarified so that the parking spaces would not need to be located on the same property. This would exclude from the scope parking spaces that are located on the property but are not directly related to the parking of the occupants of that building. Whether parking spaces are considered to be physically adjacent to a building would be decided on a case-by-case basis. In most cases, this would be clear. Usually the owners of a building and car parking spaces are the same, and the parking spaces belonging to the building are clearly marked and assigned through various ownership and management arrangements. The parking spaces intended for the users of a building could be located in the basement or on the roof of the building, or in an adjacent parking area, for example (see Chapter 5.1.2 above). The spaces could also be located on a different property.

The new subsection 6 would provide that sections 5c, 5e and 6a apply where a car park is located inside a building or is physically adjacent to a building, and where major renovation covers the car park or the electrical infrastructure of the car park. The car parks physically adjacent to buildings and major renovation are further specified in section 3 of the proposed act.

The proposed new subsection 7 would provide that the recharging point obligations become applicable when a construction permit pursuant to section 42 of the Construction Act (751/2023) is applied for regarding a building. This would not alter the current Act, but as it is a provision concerning the scope, it would be moved to section 2 to avoid repetition.

Section 3, Definitions. Definitions for a recharging point, ducting, pre-cabling, major renovation, a public body, a roofed car parking space, smart recharging and bi-directional recharging would be added to the definitions in section 3, and the definition of recharging point capability would be updated. This would change the numbering of the other definitions.

Section 3, subsection 1 of the proposed act would provide for a definition of a recharging point. Section 3 of the current Act does not contain a definition of a recharging point. Under section 9, subsection 1 of the current Act, the recharging points referred to in sections 5 to 8 of the Act must be normal-power recharging points or high-power recharging points with the technical characteristics specified in Annex II to Directive 2014/94/EU of the European

Parliament and of the Council on the deployment of alternative fuels infrastructure. The definition of a recharging point would be moved from the existing section 9 to the definitions in section 3 of the proposed act and clarified.

In accordance with Article 2(33) of the Energy Performance of Buildings Directive, a recharging point means a recharging point as defined in Article 2(48) of the Alternative Fuels Infrastructure Regulation. According to the paragraph, a recharging point means a fixed or mobile, on-grid or off-grid interface for the transfer of electricity to an electric vehicle which, although it may have one or more connectors to accommodate different connector types, is capable of recharging only one electric vehicle at a time, and which excludes devices with a power output less than or equal to 3.7 kW the primary purpose of which is not the recharging of electric vehicles. Recharging points should therefore be such that they are intended for the transfer of electricity to an electric vehicle. Devices with a power output less than 3.7 kW would only be classified as recharging points if their *primary* purpose was to recharge electric vehicles. In addition, under the Annex II to the Regulation, alternating current normal-power recharging points for electric vehicles must be equipped, for interoperability purposes, at least with socket-outlets or vehicle connectors of Type 2 as described in standard EN IEC 62196-2:2017. The Regulation divides recharging points by power into the following types:

- a high-power recharging point is a recharging point with a power output exceeding 22 kW
- a normal-power recharging point is a recharging point with a power output of up to 22 kW.

Under the Regulation, ‘power output’ means the theoretical maximum power that a recharging point, station or pool, or a shore-side electricity supply installation can provide to vehicles connected to that recharging point. The Regulation does not therefore require that power to be available at all times. Often, it is possible to use load management to, for example, temporarily limit the recharging power to a lower level. While an electric car can be recharged using a standard protective contact socket at a slow speed, it is not recognised as a recharging point in the Alternative Fuels Infrastructure Regulation.

In practice, the reference to the definitions in the Alternative Fuels Infrastructure Regulation means that a recharging point under the Directive is a standard recharging device with a Type 2 socket-outlet or a direct current recharging device with a CCS socket. The definition in the Regulation allows the recharging power to be less than 3.7 kW if the device is intended for recharging electric vehicles. Meanwhile, a standard protective contact socket does not meet the requirement of the definition, as it is a device with a power output less than 3.7 kW, and its primary purpose is not to charge electric vehicles.

It is up to the Member States to decide whether their national legislation should specify whether recharging points must be normal-power or high-power recharging points, or whether a power requirement is set for recharging points. These would not be subject to separate provisions. The technical requirements for electric vehicle recharging points and recharging point capabilities would continue to be laid down in section 9 of the Act.

The definition of recharging point capabilities would be clarified so that they would refer to either ducting or pre-cabbling. Ducting and pre-cabbling would be defined separately. Ducting would refer to conduits or other cable routes into which the necessary cabling for electric vehicle recharging points can be installed at a later date. Ducting would have a broad

meaning. In indoor car parks, existing cable racks or similar fixtures and wall seal wires would be considered to constitute ducting. Pre-cabling would refer to all measures necessary for the installation of recharging points, including data transmission, cables, cable routes and, where appropriate, electricity meters. The definition of pre-cabling would correspond to the definition in Article 2(34) of the Directive.

According to the updated Directive, the possibility of recharging L-category electric vehicles in the future must also be considered when building capabilities. However, this addition has no bearing on the development of recharging capabilities, as the recharging of L-category vehicles such as mopeds, motorcycles or electric bicycles does not require any recharging capabilities that are not already present in the car recharging infrastructure.

In the future, the definition of major renovation would refer to the definition of major renovation in the Construction Act. The content of the definition would not change.

It is necessary to add the definition of a public body to the Act, as section 5a of the proposed act would lay down separate requirements for the recharging points and recharging point capabilities of buildings owned by public bodies. A public body would refer to public bodies as defined in Article 2(12) of Directive (EU) 2023/1791. The definition corresponds to the definition in Article 2(5) of the Energy Performance of Buildings Directive. According to the paragraph, public bodies mean national, regional or local authorities and entities directly financed and administered by those authorities but not having an industrial or commercial character.

Definitions for smart recharging and bi-directional recharging would be added to this section. The definitions would correspond to those in Article 2(37) and (38) of the Energy Performance of Buildings Directive. Smart recharging would refer to smart recharging as defined in Article 2(2)(14m) of Directive (EU) 2023/2413 of the European Parliament and of the Council (RED III). According to it, smart recharging means a recharging operation in which the intensity of electricity delivered to the battery is adjusted dynamically, on the basis of information received through electronic communication. With regard to the definition of bi-directional recharging, the Energy Performance of Buildings Directive refers to – as would the proposed act – the definition in the Alternative Fuels Infrastructure Regulation, according to which bi-directional recharging means a smart recharging operation where the direction of the electricity flow can be reversed, allowing that electricity flows from the battery to the recharging point it is connected to.

The proposed amendment would also define that a car park physically adjacent to a building would mean a car park intended for the use of residents, visitors or workers of the building and located within the property area of the building or in the direct vicinity of the building. The definition would correspond to Article 2(65) of the Energy Performance of Buildings Directive. According to the current Act, car parking spaces should be located on the same property. However, car parks may often be arranged in different ways, and parking arrangements do not necessarily follow the property line. The new definition would clarify when a car park would be considered to be part of a building.

A definition of a bicycle parking space would be added to the Act in line with the definition in the Directive. According to it, a bicycle parking space is a designated space for parking at least one bicycle.

The section would also define a functionally feasible solution. The functionally feasible solution would refer to a solution which does not, in itself, impair or prevent the use of a system, building or part of a building.

Section 4. Relationship with other legislation. Section 4, subsection 1 of the Act is amended to remove the reference to the number of the Construction Act. The number of the Construction Act is referred to in section 3 of the Act.

Chapter 2. Requirements for electric vehicle recharging points, recharging point capabilities and bicycle parking spaces in buildings. The title of chapter 2 of the Act would be clarified to also cover requirements for bicycle parking spaces.

Section 5. Non-residential buildings with more than 20 car parking spaces.

Section 5 of the proposed act would lay down requirements concerning recharging points and recharging point capabilities in existing non-residential buildings with more than 20 car parking spaces. The scope of this section would correspond to that of section 7 of the current Act; in other words, it would apply to existing buildings that are not residential buildings. The current section stipulates that the owner of an existing non-residential building with more than 20 car parking spaces in the building or on the property must ensure that at least one recharging point is installed by 31 December 2024 at the latest. Under section 17 of the current Act, this is supervised by the Finnish Transport and Communications Agency Traficom.

This current requirement would now be clarified to stipulate that one recharging point must be installed for every ten car parking spaces. If there were 20 or fewer car parking spaces, the requirement would not apply. If there were 21 car parking spaces, two recharging points would be required. If there were 50 car parking spaces, five recharging points would be required. If there were 100 car parking spaces, 10 recharging points would be required.

The alternative for recharging points would be the provision of ducting for 50 per cent of car parking spaces. Under the Directive, Member States may decide whether to require either one recharging point for every 20 car parking spaces or the installation of ducting for at least 50 per cent of car parking spaces. A combination of these is also possible. Under the proposed provision, the owner of a building would be allowed to decide which of the requirements is met. This would allow the owner of the building the greatest possible flexibility to fulfil the obligation they consider the most suitable for them.

The Energy Performance of Buildings Directive stipulates that requirements for bicycle parking spaces must be imposed on existing non-residential buildings. Accordingly, the proposed section 5 would provide that such buildings must also provide bicycle parking spaces amounting to at least 15 per cent of the building's average user capacity or 10 per cent of its total user capacity, taking into account the space required for bicycles larger than standard bicycles. It would be up to the building owner to decide which of the two conditions to fulfil when providing bicycle parking spaces.

However, it is proposed that the act would provide for an exemption from the obligation to provide bicycle parking spaces, as allowed by Article 14(3) of the Directive. Buildings that are not typically accessed by bicycles should have as many bicycle parking spaces as is appropriate. The requirement for bicycle parking spaces does not apply to buildings that are not typically accessed by bicycle. This includes shops, supermarkets or offices located along

motorways, which are inaccessible by bicycle. However, this exemption should be interpreted narrowly, and in reality, there are thought to be only a few such buildings in Finland. The exception would therefore be applied very rarely. In Finland, shopping centres located along motorways are generally accessible by bicycle; people visit them by bicycle, and the staff working in them may commute by bicycle. Bicycle parking spaces are not subject to quality requirements, and it would be the responsibility of building owners to determine the average or total user capacity of buildings.

In accordance with Article 14(2)(3) of the Energy Performance of Buildings Directive, Member States may postpone the implementation of this requirement until 1 January 2029 for all non-residential buildings which have undergone major renovation during the two years preceding the entry into force of this Directive, i.e. prior to 28 May 2024, to comply with the national requirements established under Article 8(3) of Directive 2010/31/EU. This requirement refers to section 7 of the current Act, which would, however, be repealed as part of the proposed act. Consequently, if electric vehicle recharging points have been installed in a building between 28 May 2022 and 28 May 2024 in compliance with the recharging point requirement under current legislation, the new requirements will not need to be met until 1 January 2029.

Section 5a. Buildings owned by public bodies. A new section 5a would be added to the Act, setting out the requirements for recharging points in non-residential buildings owned by public bodies. A public body is defined in section 3 of the proposed act. Public bodies would mean national, regional or local authorities and entities directly financed and administered by those authorities but not having an industrial or commercial character. They would be subject to an obligation to install pre-cabling for 50 per cent of car parking spaces by 1 January 2033 at the latest. The requirement applies to car parks of all sizes, while section 5 applies to car parks with more than 20 car parking spaces. The underlying principle is that buildings owned or used by public bodies should set an example by demonstrating that they pay attention to environmental and energy considerations in the buildings. This provision would implement Article 14(2)(2) of the Directive.

Section 5b. New non-residential buildings with more than five car parking spaces. While section 5 of the proposed act would lay down provisions regarding the electric vehicle recharging points required in *existing* non-residential buildings, section 5b would set out requirements concerning the recharging points in *new* non-residential buildings. For reasons of legal clarity, the existing provisions would be reorganised into several sections. Section 2 would provide that in the case of new buildings, the recharging point obligations become applicable when a construction permit pursuant to section 42 of the Construction Act (751/2023) is applied for regarding a building.

A significant change from the previous requirements is that they applied to buildings with more than 10 car parking spaces. Another new requirement is to install one recharging point for every five car parking spaces, whereas previously one recharging point was required for the entire car park.

As stated, that requirement would apply in the case of a new building for the construction of which a construction permit pursuant to section 42 of the Construction Act (751/2023) must be applied for. In the proposed act, the requirement would be set out in section 2.

The Energy Performance of Buildings Directive stipulates that requirements for bicycle parking spaces must be imposed on existing non-residential buildings. The proposed section

5a would therefore also provide for bicycle parking spaces. In this respect, the same rationale would apply as in the proposed section 5.

Section 5c. Non-residential buildings with more than five car parking spaces undergoing major renovation.

The new section 5c would lay down the requirements for recharging points applied to non-residential buildings undergoing major renovation. The current requirements for recharging points in non-residential buildings undergoing major renovation are laid down in section 6 of the Act currently in force.

The provision on the scope in section 2 of the act would stipulate that the proposed section 5c applies if the car park is located inside a building or is physically adjacent to the building, and the major renovation covers the car park or the electrical infrastructure of the car park. Major renovation and a car park physically adjacent to a building would be defined in section 3 of the proposed act.

Under the proposed section 5c, non-residential buildings with more than five car parking spaces and undergoing major renovation must have at least one recharging point installed for every five car parking spaces, pre-cabling installed in at least 50 per cent of the parking spaces, and ducting provided for the remaining parking spaces. Requirements for bicycle parking spaces would also be laid down. The same exemptions as those set out in sections 5 and 5b would apply to the organisation of bicycle parking, and the rationale provided for the proposed section 5 would also apply to section 5c.

Section 5d. New office buildings with more than five car parking spaces. The new sections 5d and 5e of the proposed act would lay down requirements for recharging points in office buildings. Office buildings would be subject to stricter requirements than other buildings. By way of derogation from the proposed section 5b, new office buildings with more than five car parking spaces must be equipped with at least one recharging point for every two car parking spaces. This obligation would implement Article 14(1)(4) of the Directive.

Section 5e. Office buildings with more than five car parking spaces undergoing major renovation. By way of derogation from the proposed section 5b, office buildings with more than five car parking spaces and undergoing major renovation must be equipped with at least one recharging point for every two car parking spaces. This obligation would implement Article 14(1)(4) of the Directive.

Section 6. New residential buildings with more than three car parking spaces. This provision would lay down requirements for recharging points in new residential buildings. Under the Directive, the requirement would apply to residential buildings with three or more car parking spaces.

In addition to the recharging point requirements for residential buildings undergoing major renovation, new residential buildings are also subject to a requirement to install one recharging point. Pre-cabling should also be installed in at least 50 per cent of the car parking spaces in new residential buildings, and ducting should be installed in the remaining parking spaces. In addition, new residential buildings should provide at least two bicycle parking spaces per residential building unit, i.e. per dwelling.

New residential buildings are always subject to a construction permit. According to the proposed section 6, subsection 2, municipalities could, for special reasons, adjust the number of bicycle parking spaces. For example, a special reason could be that a residential building is constructed as an infill development on a very narrow plot, meaning that the requirements for bicycle parking spaces could not be met. In the vast majority of cases, the bicycle parking spaces planned for new residential buildings would already meet the requirements of the Directive even without a statutory obligation.

Section 6a. Residential buildings with more than three car parking spaces undergoing major renovation. This section would lay down requirements for recharging points in residential buildings undergoing major renovation. The scope of the proposed sections 2 would be relevant when assessing the obligation to install recharging points in connection with major renovations.

In residential buildings undergoing major renovation, the obligations to install recharging points would correspond to those concerning new buildings in terms of ducting and pre-cabling. In addition to these, new residential buildings must be fitted with one recharging point. Like new residential buildings, residential buildings undergoing major renovation must be equipped with at least two bicycle parking spaces for each residential building unit. When granting a construction permit, the local building supervision authority could, for special reasons, adjust the requirements regarding the number of bicycle parking spaces (see the rationale for section 6 concerning special reasons). If ensuring two bicycle parking spaces for every residential building unit is not possible in major renovations, the building must have as many bicycle parking spaces as is appropriate.

Section 9. Technical requirements for electric vehicle recharging points and recharging point capabilities. Section 9 of the act would continue to lay down technical requirements for recharging points and recharging point capabilities. The title of the section would be clarified by adding the word 'technical'. The definition of a recharging point would be moved to section 3 of the proposed act.

First, recharging points should be capable of smart recharging. Smart recharging is defined in section 2 of the proposed act. Smart recharging capability would not be necessary if it was not technically feasible. Second, recharging points should be capable of bi-directional recharging, provided this is technically feasible.

The section also proposes that provisions be laid down regarding the dimensioning of pre-cabling and ducting in accordance with the requirements of the Directive. Under the proposed provision, pre-cabling and ducting should be dimensioned so as to enable the simultaneous and efficient use of the required number of recharging points. The dimensioning should, where necessary, support the installation of a load or recharging management system, to the extent that this is technically and economically feasible and justifiable.

The proposed section would also provide that the recharging points referred to in this act may also be publicly accessible recharging points within the meaning of Article 2(45) of the Alternative Fuels Infrastructure Regulation. Recharging points would therefore not need to be publicly accessible; instead, they could be reserved for staff only, for example.

The requirement in subsection 4 of the proposed section, stipulating that at least one recharging point must be installed in a car parking space that is at least 3.6 metres wide and at least 5.0 metres long, corresponds to the requirement under the current Act. This requirement

ensures that persons who need accessible parking spaces also have the possibility to recharge an electric car.

Section 10. Exemption concerning the cost of major renovation of a building. Section 10 of the act would provide for an exemption related to the value of buildings. Under Article 14(5) of the Directive, Member States may decide not to apply Article 14(1), (2) and (4) to certain categories of buildings where the cost of the recharging and ducting installations exceeds at least 10 per cent of the total cost of the major renovation of the building. It is therefore proposed to provide that the obligations of the act would not apply if the cost of the recharging and ducting installations exceeds at least 10 per cent of the total cost of the major renovation of the building. The exemption could also apply in cases in which no major renovation is actually carried out, i.e. in cases of assessing the application of the recharging point requirements to the existing building stock in accordance with section 5 of the act.

Table 6 presents estimates of costs exceeding those of major renovations, broken down by building type, based on the average building replacement costs. The table also includes a calculation of how much 10 per cent of these costs would be. This exemption would allow a significant proportion of the old building stock – which is in poor condition and may contain a large number of car parking spaces – to be excluded from the requirements. On the other hand, if the number of car parking spaces is small, the cost of meeting the requirements for recharging points will also be low, which reduces the scope for applying the exemption.

Table 6. The average building replacement values and the cost limit for recharging points and their capabilities above which an exemption from the requirements is allowed under the Directive.

Replacement values for different types of buildings and the average cost of major renovation					derogation allowed if the cost exceeds this amount, EUR
	average size, m ²	average replacement value, EUR/m ²	average replacement value, EUR	strike price for major renovation	
detached and semi-detached houses	154	657.46	101 249	25 300	2 530
residential blocks of flats	1 692	657.46	1 112 422	278 100	27 810
office buildings	1 881	911.09	1 713 760	428 400	42 840
educational buildings	1 845	976	1 800 720	450 200	45 020
buildings for institutional care	1 849	1 093	2 020 957	505 200	50 520
assembly buildings	754	920	693 680	173 400	17 340

Section 11. Equipping non-residential buildings with a building automation and control system. Section 11 of the act would provide for the installation of automation and control

systems in non-residential buildings. Under the current Act, the obligation to equip a building with an automation and control system is divided into three different sections: section 11 concerns the installation of an automation and control system in a new building; section 12 concerns the installation of an automation and control system in a building undergoing renovation or alteration; and section 13 concerns the installation of an automation and control system in an existing building. In the current Act, the obligations regarding buildings were divided into different provisions for the sake of clarity. The requirement concerning existing buildings came into force on 31 January 2024. For the sake of clarity, separate provisions were included regarding new buildings as well as those undergoing renovation and alteration so that a new installation of an automation and control system would not be required in these buildings by 31 December 2024 in accordance with section 13. As all buildings falling within the scope of this section would now be required to be equipped with an automation and control system, this could be provided in a single provision.

According to the proposed section 11, building owners must ensure that buildings are equipped with an automation and control system. All occupied non-residential buildings in which the effective rated output of the heating system or combined space heating and ventilation system exceeds 290 kW, or in which the effective rated output of the air-conditioning system or combined air-conditioning and ventilation system exceeds 290 kW, must be equipped with an automation and control system. This applies to existing buildings, new buildings and buildings undergoing major renovation.

In addition, the proposed section 11 would introduce a new requirement for the installation of automation and control systems. According to the proposed subsection 2, building owners should ensure by 1 January 2029 that occupied non-residential buildings in which the effective rated output of the heating system or combined space heating and ventilation system exceeds 70 kW, or in which the effective rated output of the air-conditioning system or combined air-conditioning and ventilation system exceeds 70 kW, are equipped with a building automation and control system. In other words, the requirement regarding the installation of automation and control systems would be tightened from the start of 2029. The requirement would apply to buildings in use at the beginning of 2029, not only to buildings to be constructed or renovated from the beginning of 2029.

Section 12. Equipping new residential buildings and those undergoing major renovation with an automation and control system. The proposed new section 12 would provide for the equipping of residential buildings with an automation and control system. The proposed provision would only apply to new residential buildings and those undergoing major renovation. The provision would therefore not require existing buildings to be renovated to comply with the requirements. Under the recast Energy Performance of Buildings Directive, it is mandatory to lay down provisions regarding this requirement, whereas under the previous Directive, Member States had the option to adjust it.

Under the provision, new residential buildings and those undergoing major renovation must have the functionality of continuous electronic monitoring that measures system efficiency and informs building owners or managers in the case of a significant variation and when system servicing is necessary. Buildings must also be equipped with effective control functionalities to ensure optimum generation, distribution, storage, use of energy and, where applicable, hydronic balance. Buildings must also have a capacity to react to external signals and adjust the energy consumption.

An exemption concerning the automation and control systems for residential buildings is provided for in section 15 of the act. The obligations under section 12 will therefore not apply if they cannot be fulfilled for financial, technical or functional reasons.

Section 13. Equipping non-residential buildings with automatic lighting controls. The proposed section 13 would lay down a new requirement to equip buildings with automatic lighting controls. The proposed section would provide for two deadlines for the adjustment of automatic lighting.

First, by 1 January 2028, automatic lighting controls should be installed in non-residential buildings in which the effective rated output of the heating systems, air-conditioning systems, combined space heating and ventilation systems, or combined air-conditioning and ventilation systems is more than 290 kW.

Second, by 1 January 2030, automatic lighting controls should be installed in non-residential buildings in which the effective rated output of the heating systems, air-conditioning systems, combined space heating and ventilation systems, or combined air-conditioning and ventilation systems is more than 70 kW.

The provision would also stipulate that automatic lighting controls must be suitably zoned and capable of occupancy detection.

The scope of the proposed section 13 would be limited by the proposed section 15, under which section 13 would not apply if it was not technically or economically feasible to equip a building with automatic lighting controls.

Section 14. Requirements concerning building automation and control systems. As in the current provision, section 14 of the act would lay down requirements for building automation and control systems. Subsections 1 to 3 would remain unchanged. However, a provision required under the recast Energy Performance of Buildings Directive would be added to the section, stipulating that building automation and control systems must also be capable of monitoring the quality of the indoor environment. It is proposed that the quality of the indoor environment be defined in section 3, in which subsection 18 would state that the indoor environmental quality means the result of an assessment of the conditions inside a building that influence the health and wellbeing of its occupants, based upon parameters such as those relating to the temperature, humidity, ventilation rate and presence of contaminants.

Section 15. Exemptions from the obligation to install a building automation and control system and automatic lighting controls. Section 15 of the act would, as before, provide for exemptions from the installation requirement. Exemptions concerning residential buildings and automatic lighting controls would also be added to the section.

According to subsection 1, the provisions of section 11 would not apply if the installation of a building automation and control system was not technically or economically feasible, or if the requirements of section 14 could be met by a combination of several systems, which could also be connected to several buildings. This corresponds with the current provision. According to subsection 2 of this section, the provisions of section 12 would not apply if the installation of a building automation and control system was not technically, economically or functionally feasible. According to subsection 3, the provisions of section 13 would not apply if it was not technically or economically feasible to equip a building with automatic lighting controls. Economic, technical and functional feasibility is defined in section 3 of the act.

Section 15a. Exemption of certain buildings from the inspection requirement. The section would update the reference to the recast Energy Performance of Buildings Directive. No further changes to the provision would be made.

Section 17. Supervisory authority. The reference in subsection 1 to section 7 of this act would be amended to refer to section 5 of this act. The Finnish Transport and Communications Agency Traficom would continue to oversee the provision of recharging points for electric vehicles. This supervision would be carried out on a random basis. It would continue to be carried out in collaboration with the building supervision authorities, and the necessary information would be collected from sources such as the construction permit data submitted to the built environment information system.

Section 18. Right to carry out inspections. In this section, the reference to section 7 would be changed to reference to section 5. No other amendments would be made to this section.

Section 19. Coercive measures. In this section, the reference to section 7 would be changed to reference to section 5. No other amendments would be made to this section.

8 Subordinate legislation

The requirements for the energy performance of building technical systems are laid down in the Decree of the Ministry of the Environment on the requirements for the energy performance of certain technical systems (718/2020). The Decree was issued pursuant to section 117g, subsection 4 and section 150f, subsection 4 of the Land Use and Building Act (132/1999). These provisions are now set out in the Construction Act (751/2023), which entered into force on 1 January 2025.

The Ministry of the Environment's decree on technical systems is due to be issued in spring 2026, and it would repeal the previous Decree (718/2020). It would set out technical requirements that may be laid down by decree of the Ministry of the Environment pursuant to the enabling provisions of the Construction Act. The decree would implement the requirements of the recast Energy Performance of Buildings Directive for the energy performance of technical building systems. The decree has been prepared by the monitoring group and preparatory group involved in implementing the Energy Performance of Buildings Directive, with extensive participation by stakeholders. The decree was open for consultation from xx xx 202x to xx xx 202x.

9 Entry into force

The acts are proposed to enter into force as soon as possible, as the recast Energy Performance of Buildings Directive must be transposed into national law by 28 May 2026.

10 Implementation and monitoring

The Ministry of the Environment will monitor the impact of the proposed provisions and take action if necessary.

11 Relationship to the Constitution and legislative procedure

The Constitutional Law Committee issued a statement on the government proposal for the Recharging Points and Automation Act (PeVL 26/2020 vp–HE 23/2020 vp). According to the

Constitutional Law Committee, the bill was significant primarily in relation to section 15 of the Constitution concerning the protection of property. The regulation is also closely connected to the environmental fundamental right under section 20 of the Constitution. Under section 20, subsection 1 responsibility for nature and biodiversity, the environment and the cultural heritage belongs to everyone. The scope of the provision covers both the prevention of environmental destruction or pollution and active measures that benefit nature, and the individual's role may be realised through both active action and passive abstention from causing harm to the environment (HE 309/1993 vp, p. 66; PeVL 20/2010 vp, p. 2/II; PeVL 6/2010 vp, p. 2/I).

In examining the restrictions on property rights related to the promotion of environmental responsibility, the Constitutional Law Committee paid particular attention to the relationship between the constitutional provision on the protection of property and the provision on environmental responsibility, based on a balancing of these interests. On one hand, the Committee noted that the environmental fundamental right provision of section 20 of the Constitution does not establish individually verifiable obligations, nor does it constitute a separate basis for imposing tolerance obligations that fall particularly on landowners. On the other hand, as components of the same fundamental rights framework, both provisions may influence the interpretation of each other in contexts in which the aim is to achieve legislative solutions that promote a balance between human activity and the environment (e.g. PeVL 55/2018 vp, p. 3; PeVL 10/2014 vp, p. 4/II; PeVL 20/2010 vp, p. 2/II; PeVL 6/2010 vp, p. 2/II). In its assessment of the acceptability and proportionality of restrictions on the use of property, the Constitutional Law Committee gave particular weight to grounds connected to section 20 of the Constitution (e.g. PeVL 55/2018 vp, p. 4; PeVL 10/2014 vp, p. 4/II; PeVL 36/2013 vp, p. 2/I; PeVL 6/2010 vp, p. 3/I). Insufficient consideration of the need to balance the protection of property and the environmental fundamental right may also constitute a factor bearing on the legislative procedure to be followed (PeVL 69/2018 vp, p. 5).

The Constitutional Law Committee considered that the regulation concerns obligations imposed on building owners and those undertaking construction or renovation projects, with the aim of improving the energy performance of buildings and mitigating climate change. The regulation was based on compelling and acceptable grounds connected to section 20 of the Constitution.

The Committee further considered that, given its purpose and content, the regulation does not run counter to the requirement of proportionality either. In this regard, relevant provisions include those limiting the scope of the obligations and establishing transitional periods. In light of the rationale accompanying the proposal, the obligations laid down in the act primarily concerned legal persons. In addition, buildings owned and occupied by microenterprises had been excluded from the scope of certain obligations. In accordance with the Constitutional Law Committee's established practice, the legislator's margin of discretion in terms of the protection of property is, in principle, greater where regulation restricting property rights is directed at legal persons with substantial assets, compared to situations in which the effects of such regulation become very direct for the position of the natural persons behind the legal person (see e.g. PeVL 55/2018 vp, p. 3; PeVL 21/2010 vp, pp. 2 to 3; PeVL 9/2008 vp, p. 4/I).

The Constitutional Law Committee further considered that, from the perspective of the protection of property, a preferable solution to the one now proposed would be to compensate property owners for the costs arising from the act. However, the Committee has consistently held that section 15, subsection 1 of the Constitution does not give rise to a requirement to compensate the owner for any restriction on use whatsoever, nor to a requirement of full

compensation when compensation is granted. In accordance with the Committee's practice, the compensation of a restriction on the use of property is one factor in the overall assessment taken into account in the constitutional assessment of whether a restriction on the right of use is permissible from the perspective of the constitutional protection of property (e.g. PeVL 10/2014 vp; PeVL 24/2012 vp; PeVL 20/2010 vp; PeVL 6/2010 vp). On the other hand, the Constitution does not preclude a higher level of compensation than that required by it, provided that the amount of compensation does not rise so high that the responsibility for protection referred to in section 20, subsection 1 of the Constitution is forced to yield as the financial burden arising from the protection increases (PeVL 6/2010 vp, p. 4/I; PeVL 20/2010 vp, p. 4).

The provisions now proposed do not introduce obligations of a new type for building owners or those undertaking construction projects, although the existing obligations are being tightened and new obligations would be introduced, including requirements for bicycle parking spaces and lighting controls. However, these would be requirements aimed at improving the energy performance of buildings and mitigating climate change. The regulation therefore has compelling and acceptable grounds connected to section 20 of the Constitution, and given its purpose and content, it does not run counter to the requirement of proportionality either.

On the basis of the above considerations, the bills may be processed in the normal legislative procedure.

Resolution

As the Energy Performance of Buildings Directive contains provisions that are proposed to be implemented by an act, the following bill will be submitted to Parliament for adoption:

Act

amending the Act on Equipping Buildings with Electric Vehicle Recharging Points and Recharging Point Capabilities and Automation and Control Systems

In accordance with the decision of Parliament, sections 7 and 8 of the Act on Equipping Buildings with Electric Vehicle Recharging Points and Recharging Point Capabilities and Automation and Control Systems (733/2020) are *repealed*;

sections 1 to 3, section 4, subsection 1, title of chapter 2, sections 5 to 6, sections 9 to 15, section 15a, section 17, subsection 1, and sections 18 to 19, such as section 4, subsection 1, sections 5 to 6 as amended in part, and sections 11 to 12 stand in Act 758/2023, of these section section 9 as amended in part by Act 476/2024, and such as section 15a stands in Act 987/2022, are *amended*; and

new sections 5a, 5b, 5c, 5d, 5e and 6a are *added* as follows:

‘Section 1

Purpose of the Act

This Act partly implements Directive (EU) 2024/1275 of the European Parliament and of the Council on the energy performance of buildings.

Section 2

Scope

This Act sets out provisions regarding the installation of electric vehicle recharging points and recharging point capabilities and automation and control systems in buildings.

This Act shall only apply to buildings in which energy is used to maintain the indoor climate.

This Act shall not apply to buildings occupied by the defence administration.

Sections 5b, 5d, 6 of this Act shall apply to car parking spaces located inside a building and to car parking spaces physically adjacent to a building.

Sections 5c, 5e and 6a of this Act shall apply where a car park is located inside a building or is physically adjacent to a building, and where major renovation covers the car park or the electrical infrastructure of the car park.

Sections 5b, 5c, 5d, 5e, 6 and 6a of this Act shall apply to construction projects subject to a construction permit pursuant to section 42 of the Construction Act (751/2023).

Section 3

Definitions

For the purposes of this Act:

1) *recharging point* means a recharging point as defined in Article 2, point (48), of Regulation (EU) 2023/1804 of the European Parliament and of the Council (27);

2) *recharging point capabilities* mean ducting or pre-cabbling;

3) *ducting* means conduits or other cable routes into which the necessary cabling for electric vehicle recharging points can be installed at a later date;

4) *pre-cabling* means all measures necessary for the installation of recharging points, including data transmission, cables, cable routes and, where appropriate, electricity meters;

5) *major renovation* means major renovation within the meaning of section 14, subsection 2 of the Construction Act;

6) *public bodies* mean public bodies as defined in Article 2, point 12 of Directive (EU) 2023/1791;

7) *smart recharging* means smart recharging as defined in Article 2, second paragraph, point (14m), of Directive (EU) 2018/2001 of the European Parliament and of the Council;

8) *bi-directional recharging* means bi-directional recharging as defined in Article 2, point 11 of Regulation (EU) 2023/1804;

9) *a car park physically adjacent to the building* means a car park which is intended for the use of residents, visitors or workers of a building and which is located within the property area of the building or is in the direct vicinity of the building;

10) *residential building* means a building intended for residential use, at least half of whose floor area is used for residential purposes;

11) *bicycle parking space* means a designated space for parking at least one bicycle;

12) *building automation and control system* means a system comprising all products, software and engineering services that can support energy-efficient, economical and safe operation of technical building systems through automatic controls and by facilitating the manual management of those technical building systems;

13) *heating system* means a combination of the components required to provide a form of indoor air treatment, by which the temperature is increased;

14) *air-conditioning system* means a combination of the components required to provide a form of indoor air treatment, by which temperature is controlled or can be lowered;

15) *effective rated output* means the maximum calorific output, expressed in kW, specified and guaranteed by the manufacturer as being deliverable during continuous operation while complying with the useful efficiency indicated by the manufacturer;

16) *technically feasible solution* means a solution that can be implemented without making essential changes to a building or its heating, cooling or ventilation system, or to a combination of them;

17) *economically feasible solution* means a solution in which the total expected benefits of the investment exceed the investment and operating costs;

18) *functionally feasible solution* means a solution that does not result in a reduction or prevention of the use of the system, building or part of a building as a whole due to the effect of the solution; and

18) *indoor environmental quality* means the result of an assessment of the conditions inside a building that influence the health and wellbeing of its occupants, based upon parameters such as those relating to the temperature, humidity, ventilation rate and presence of contaminants.

Section 4

Relationship with other legislation

The duties of the local building supervision authority in monitoring compliance with construction permits are laid down in the Construction Act.

Chapter 2

Requirements for electric vehicle recharging points, recharging point capabilities and bicycle parking spaces in buildings

Section 5

Non-residential buildings with more than 20 car parking spaces

By 31 December 2026 at the latest, non-residential buildings with more than 20 car parking spaces shall:

- 1) be equipped with at least one recharging point for every 10 car parking spaces or have ducting for at least 50 per cent of the car parking spaces; and
- 2) provide bicycle parking spaces amounting to at least 15 per cent of the building's average user capacity or 10 per cent of its total user capacity, taking into account the space required for bicycles larger than standard bicycles.

Buildings that are not typically accessed by bicycles shall have as many bicycle parking spaces as is appropriate.

By way of derogation from the deadline laid down in subsection 1, buildings in which recharging points were installed between 28 May 2022 and 28 May 2024 in order to comply with the requirements of section 7 of the Act on Equipping Buildings with Electric Vehicle Recharging Points and Recharging Point Capabilities and Automation and Control Systems (733/2020) shall comply with the requirements of this section by 1 January 2029 at the latest.

Section 5a

Non-residential buildings owned by public bodies

In addition to the provisions of section 5 of this Act, buildings owned or occupied by public bodies shall have pre-cabling installed for at least 50 per cent of the car parking spaces by 1 January 2033 at the latest.

Section 5b

New non-residential buildings with more than five parking spaces

New non-residential buildings with more than five parking spaces shall:

- 1) be equipped with at least one recharging point for every five car parking spaces;
- 2) be equipped with pre-cabling for at least 50 per cent of the car parking spaces and ducting for the remaining car parking spaces; and
- 3) provide bicycle parking spaces amounting to at least 15 per cent of the building's average user capacity or 10 per cent of its total user capacity, taking into account the space required for bicycles larger than standard bicycles.

Buildings that are not typically accessed by bicycles shall have as many bicycle parking spaces as is appropriate.

Section 5c

Non-residential buildings with more than five parking spaces undergoing major renovation

Non-residential buildings with more than five parking spaces and undergoing major renovation shall:

- 1) be equipped with at least one recharging point for every five car parking spaces;
- 2) be equipped with pre-cabbling for at least 50 per cent of the car parking spaces and ducting for the remaining car parking spaces; and
- 3) provide bicycle parking spaces amounting to at least 15 per cent of the building's average user capacity or 10 per cent of its total user capacity, taking into account the space required for bicycles larger than standard bicycles.

Buildings that are not typically accessed by bicycles shall have as many bicycle parking spaces as is appropriate.

Section 5d

New office buildings with more than five car parking spaces

By way of derogation from section 5b, subsection 1, paragraph 1 of this Act, new office buildings with more than five car parking spaces shall be equipped with at least one recharging point adjacent to the building for every two car parking spaces.

Section 5e

Office buildings with more than five car parking spaces undergoing major renovation

By way of derogation from section 5c of this Act, office buildings with more than five car parking spaces and undergoing major renovation shall be equipped with at least one recharging point adjacent to the building for every two car parking spaces.

Section 6

New residential buildings with more than three car parking spaces

New residential buildings with more than three parking spaces shall:

- 1) be equipped with at least one recharging point;
- 2) be equipped with pre-cabbling for at least 50 per cent of the car parking spaces and ducting for the remaining car parking spaces; and
- 3) provide at least two bicycle parking spaces for every residential building unit.

When granting a construction permit, the local building supervision authority may, for special reasons, adapt the requirements concerning the number of bicycle parking spaces.

Section 6a

Residential buildings with more than three parking spaces undergoing major renovation

Residential buildings with more than three parking spaces and undergoing major renovation shall:

- 1) be equipped with pre-cabbling for at least 50 per cent of the car parking spaces and ducting for the remaining car parking spaces; and

2) provide at least two bicycle parking spaces for each residential building unit.

When granting a construction permit, the local building supervision authority may, for special reasons, adapt the requirements concerning the number of bicycle parking spaces. If ensuring two bicycle parking spaces for every residential building unit is not possible in major renovations, the building shall have as many bicycle parking spaces as is appropriate.

Section 9

Technical requirements for electric vehicle recharging points and recharging point capabilities

The recharging points referred to in this Act shall be capable of smart recharging and bi-directional recharging if this is technically feasible.

The pre-cabing and ducting installed under this Act shall be dimensioned so as to enable the simultaneous and efficient use of the required number of recharging points. The dimensioning shall, where necessary, support the installation of a load or recharging management system, to the extent that this is technically and economically feasible and justifiable.

The recharging points referred to in this Act may also be publicly accessible recharging points within the meaning of Article 2, point (45), of the Alternative Fuels Infrastructure Regulation.

At least one of the recharging points referred to in sections 5b and 5c above that are available for public use shall be installed in a car parking space that is at least 3.6 metres wide and at least 5.0 metres long.

Section 10

Exemption concerning the cost of major renovation of a building

Sections 5, 5a, 5c, 5e and 6a of this Act shall not apply if the costs of installing recharging points and ducting exceed at least 10 per cent of the total cost of major renovation of a building.

Chapter 3

Building automation and control systems

Section 11

Equipping non-residential buildings with a building automation and control system

The owner of a building shall ensure that an occupied non-residential building

1) in which the effective rated output for the heating system or combined space heating and ventilation system exceeds 290 kW;

2) in which the effective rated output for the air-conditioning system or combined air-conditioning and ventilation system exceeds 290 kW;

3) is equipped with a building automation and control system.

By 1 January 2029, the owner of a building shall ensure that an occupied non-residential building

1) in which the effective rated output for the heating system or combined space heating and ventilation system exceeds 70 kW;

- 2) in which the effective rated output for the air-conditioning system or combined air-conditioning and ventilation system exceeds 70 kW;
- 3) is equipped with a building automation and control system.

Section 12

Equipping new residential buildings and those undergoing major renovation with monitoring and control functionalities

New residential buildings and those undergoing major renovation shall have:

- 1) the functionality of continuous electronic monitoring that measures systems' efficiency and informs building owners or managers in the case of a significant variation and when system servicing is necessary;
- 2) effective control functionalities to ensure optimum generation, distribution, storage, use of energy and hydronic balance; and
- 3) a capacity to react to external signals and adjust the energy consumption.

Section 13

Equipping non-residential buildings with automatic lighting controls

Non-residential buildings with an effective rated output for heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation of over 290 kW shall be equipped with automatic lighting controls by 1 January 2028.

Non-residential buildings with an effective rated output for heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation of over 70 kW shall be equipped with automatic lighting controls by 1 January 2030.

The automatic lighting controls shall be suitably zoned and capable of occupancy detection.

Section 14

Requirements for building automation and control systems

The building automation and control systems referred to in section 11 above shall be capable of:

- 1) continuously monitoring, logging, analysing and allowing for adjusting energy use;
- 2) benchmarking the building's energy efficiency, detecting losses in efficiency of technical building systems, and informing the person responsible for the facilities or technical building management about opportunities for energy efficiency improvement;
- 3) allowing communication with connected technical building systems and other appliances inside the building, and being interoperable with technical building systems across different types of proprietary technologies, devices and manufacturers; and
- 4) monitoring indoor environmental quality.

Section 15

Derogations from the installation obligation

The provisions of section 11 shall not apply if:

1) the installation of a building automation and control system is not technically or economically feasible; or

2) the requirements of section 14 may be met by a combination of several systems, which may also be connected to several buildings.

The provisions of section 12 shall not apply if the installation of monitoring and control functionalities is not technically, economically or functionally feasible.

The provisions of section 13 shall not apply if it is not technically or economically feasible to equip a building with automatic lighting controls.

Section 15a

Exemption of certain buildings from the inspection requirement

The inspection requirements laid down in Article 23, paragraph (1), of Directive (EU) 2024/1275 of the European Parliament and of the Council on the energy performance of buildings shall not apply to:

1) buildings that meet the requirements of sections 11 to 13; nor

2) residential buildings with:

a) the functionality of continuous electronic monitoring that measures systems' efficiency and informs building owners or managers in the case of a significant variation or when system servicing is necessary; and

b) effective control functionalities to ensure optimum generation, distribution, storage and use of energy.

Chapter 4

Authorities and supervision

Section 17

Supervisory authority

The Finnish Transport and Communications Agency Traficom shall be responsible for monitoring compliance with section 5.

Section 18

Right to carry out inspections

The Finnish Transport and Communications Agency Traficom shall have the right, for the purposes of monitoring compliance with section 5, to enter any area, property or other premises to which access is necessary for the purposes of monitoring, and to carry out inspections there in connection with such monitoring. However, the right of inspection does not extend to premises used for permanent housing. Inspections must comply with section 39 of the Administrative Procedure Act (434/2003).

Section 19

Coercive measures

If the owner of a building fails to comply with the obligation laid down in section 5 to install a recharging point, the Finnish Transport and Communications Agency Traficom shall require the owner to rectify the situation within a specified time limit. If the recharging point is not installed within the deadline, Traficom shall order the building owner to install the recharging point within a new deadline set by Traficom.

This Act shall enter into force on xx xx 20xx.’

Helsinki, xx xx 20xx

Prime Minister

First name Last name

..Minister First name Last name

Act

amending the Act on Equipping Buildings with Electric Vehicle Recharging Points and Recharging Point Capabilities and Automation and Control Systems

In accordance with the decision of Parliament, sections 7 and 8 of the Act on Equipping Buildings with Electric Vehicle Recharging Points and Recharging Point Capabilities and Automation and Control Systems (733/2020) are *repealed*;

sections 1 to 3, section 4, subsection 1, title of chapter 2, sections 5 to 6, sections 9 to 15, section 15a, section 17, subsection 1, and sections 18 to 19, such as section 4, subsection 1, sections 5 to 6 as amended in part, and sections 11 to 12 stand in Act 758/2023, of these section section 9 as amended in part by Act 476/2024, and such as section 15a stands in Act 987/2022, are *amended*; and

new sections 5a, 5b, 5c, 5d, 5e and 6a are *added* as follows:

Existing Act

Proposal

Section 1

Section 1

Purpose of the Act

Purpose of the Act

This Act partly implements Directive (EU) 2018/844 of the European Parliament and of the Council amending Directive 2010/31/EU on the energy performance of buildings and Directive 2012/27/EU on energy efficiency.

This Act partly implements *Directive (EU) 2024/1275 of the European Parliament and of the Council on the energy performance of buildings.*

Section 2

Section 2

Scope

Scope

This Act sets out provisions regarding the installation of electric vehicle recharging points and recharging point capabilities and automation and control systems in buildings.

This Act sets out provisions regarding the installation of electric vehicle recharging points and recharging point capabilities and automation and control systems in buildings.

This Act shall only apply to buildings in which energy is used to maintain the indoor climate.

This Act shall only apply to buildings in which energy is used to maintain the indoor climate.

Sections 8, 9, 16, 17 and 21 to 23 shall also apply to multi-storey car parks intended to provide parking for one or more residential buildings, even if no energy is used in them to maintain the indoor climate.

This Act shall not apply to buildings occupied by the defence administration.

This Act shall not apply to buildings

Sections 5b, 5d, 6 of this Act shall apply to car parking spaces located inside a building and to car parking spaces physically

Existing Act

Proposal

Section 3

Definitions

For the purposes of this Act:

1) *recharging point capabilities* mean ducting or other cable routes into which the necessary cabling for electric vehicle recharging points can be installed at a later date, as well as cabling for electric vehicle recharging points;

2) *residential building* means a building

adjacent to a building.

Sections 5c, 5e and 6a of this Act shall apply where a car park is located inside a building or is physically adjacent to a building, and where major renovation covers the car park or the electrical infrastructure of the car park.

Sections 5b, 5c, 5d, 5e, 6 and 6a of this Act shall apply to construction projects subject to a construction permit pursuant to section 42 of the Construction Act (751/2023).

Section 3

Definitions

For the purposes of this Act:

1) *recharging point* means a recharging point as defined in Article 2, point (48), of Regulation (EU) 2023/1804 of the European Parliament and of the Council (27);

2) *recharging point capabilities* mean ducting or pre-cabling;

3) *ducting* means conduits or other cable routes into which the necessary cabling for electric vehicle recharging points can be installed at a later date;

4) *pre-cabling* means all measures necessary for the installation of recharging points, including data transmission, cables, cable routes and, where appropriate, electricity meters;

5) *major renovation* means major renovation within the meaning of section 14, subsection 2 of the Construction Act;

6) *public bodies* mean public bodies as defined in Article 2, point (12), of Directive (EU) 2023/1791;

7) *smart recharging* means smart recharging as defined in Article 2, second paragraph, point (14m), of Directive (EU) 2018/2001 of the European Parliament and of the Council;

8) *bi-directional recharging* means bi-directional recharging as defined in Article 2, point (11), of Regulation (EU) 2023/1804;

9) *a car park physically adjacent to the building* means a car park which is intended

Existing Act

intended for residential use, at least half of whose floor area is used for residential purposes;

3) *major renovation* refers to a renovation where the total cost of reconstruction costs related to the building envelope or technical building systems exceeds 25 per cent of the value of the building, excluding the value of the building land;

4) *building automation and control system* means a system comprising all products, software and engineering services that can support energy-efficient, economical and safe operation of technical building systems through automatic controls and by facilitating the manual management of those technical building systems;

5) *heating system* means a combination of the components required to provide a form of indoor air treatment, by which the temperature is increased;

6) *air-conditioning system* means a combination of the components required to provide a form of indoor air treatment, by which temperature is controlled or can be lowered;

7) *effective rated output* means the maximum calorific output, expressed in kW, specified and guaranteed by the manufacturer as being deliverable during continuous operation while complying with the useful efficiency indicated by the manufacturer;

8) *technical building systems mean technical equipment of a building or building unit used for*

space heating, space cooling, ventilation, domestic hot water, built-in lighting, building automation and control, on-site energy generation or a combination thereof, including those systems using energy from renewable sources;

9) *technically feasible solution* means a solution that can be implemented without making essential changes to a building or its heating, cooling or ventilation system, or to a combination of them; and

10) *economically feasible solution* means a solution in which the total expected benefits

Proposal

for the use of residents, visitors or workers of a building and which is located within the property area of the building or is in the direct vicinity of the building;

10) *residential building* means a building intended for residential use, at least half of whose floor area is used for residential purposes;

11) *bicycle parking space* means a designated space for parking at least one bicycle;

12) *building automation and control system* means a system comprising all products, software and engineering services that can support energy-efficient, economical and safe operation of technical building systems through automatic controls and by facilitating the manual management of those technical building systems;

13) *heating system* means a combination of the components required to provide a form of indoor air treatment, by which the temperature is increased;

14) *air-conditioning system* means a combination of the components required to provide a form of indoor air treatment, by which temperature is controlled or can be lowered;

15) *effective rated output* means the maximum calorific output, expressed in kW, specified and guaranteed by the manufacturer as being deliverable during continuous operation while complying with the useful efficiency indicated by the manufacturer;

16) *technically feasible solution* means a

Existing Act

of the investment exceed the investment and operating costs.

Section 4

Relationship with other legislation

The duties of the local building supervision authority in monitoring compliance with construction permits are laid down in the Construction Act (751/2023).

Section 5

Equipping a new building with electric vehicle recharging points or recharging point capabilities

Parties undertaking a construction project shall ensure that electric vehicle recharging points or recharging point capabilities are designed and installed adjacent to the building in accordance with this Act if the building is a new building subject to a construction permit pursuant to section 42 of the Construction Act.

A new residential building with more than four car parking spaces shall be equipped

Proposal

solution that can be implemented without making essential changes to a building or its heating, cooling or ventilation system, or to a combination of them;

17) *economically feasible solution* means a solution in which the total expected benefits of the investment exceed the investment and operating costs;

18) *functionally feasible solution* means a solution that does not result in a reduction or prevention of the use of the system, building or part of a building as a whole due to the effect of the solution; and

19) *indoor environmental quality* means the result of an assessment of the conditions inside a building that influence the health and wellbeing of its occupants, based upon parameters such as those relating to the temperature, humidity, ventilation rate and presence of contaminants.

Section 4

Relationship with other legislation

The duties of the local building supervision authority in monitoring compliance with construction permits are laid down in the Construction Act.

Chapter 2

Requirements for electric vehicle recharging points, recharging point capabilities and bicycle parking spaces in buildings

Section 5

Non-residential buildings with more than 20 car parking spaces

By 31 December 2026 at the latest, non-residential buildings with more than 20 car parking spaces shall:

1) *be equipped with at least one recharging point for every 10 car parking spaces or have ducting for at least 50 per cent of the car*

Existing Act

with recharging point capabilities adjacent to the building so that a recharging point can be installed in each parking space at a later date.

A new non-residential building with more than 10 car parking spaces shall be equipped with one high-power recharging point adjacent to the building, or alternatively:

- 1) at least one normal-power recharging point if there are 11 to 50 car parking spaces;*
- 2) at least two normal-power recharging points if there are 51 to 100 car parking spaces;*
- 3) at least three normal-power recharging points if there are more than 100 car parking spaces.*

In addition to the provisions of subsection 3, a new non-residential building with 11 to 30 car parking spaces shall be equipped with recharging point capabilities adjacent to the building for at least 50 per cent of the car parking spaces. If there are more than 30 car parking spaces, recharging point capabilities shall be installed in at least 20 per cent of the car parking spaces, provided that at least 15 car parking spaces have recharging points. If a recharging point is installed in a car parking space, it meets the requirement for the recharging point capability for the car parking space.

The obligations laid down in subsections 2 to 4 above shall apply to car parking spaces located in the building or on the property on which the building is located.

Proposal

parking spaces; and

2) provide bicycle parking spaces amounting to at least 15 per cent of the building's average user capacity or 10 per cent of its total user capacity, taking into account the space required for bicycles larger than standard bicycles.

Buildings that are not typically accessed by bicycles shall have as many bicycle parking spaces as is appropriate.

By way of derogation from the deadline laid down in subsection 1, buildings in which recharging points were installed between 28 May 2022 and 28 May 2024 in order to comply with the requirements of section 7 of the Act on Equipping Buildings with Electric Vehicle Recharging Points and Recharging Point Capabilities and Automation and Control Systems (733/2020) shall comply with the requirements of this section by 1 January 2029 at the latest.

Section 5a

Non-residential buildings owned by public bodies

In addition to the provisions of section 5 of this Act, buildings owned or occupied by public bodies shall have pre-cabling installed for at least 50 per cent of the car parking spaces by 1 January 2033 at the latest.

Existing Act

Proposal

Section 5b

New non-residential buildings with more than five parking spaces

New non-residential buildings with more than five parking spaces shall:

4) be equipped with at least one recharging point for every five car parking spaces;

5) be equipped with pre-cabling for at least 50 per cent of the car parking spaces and ducting for the remaining car parking spaces; and

6) provide bicycle parking spaces amounting to at least 15 per cent of the building's average user capacity or 10 per cent of its total user capacity, taking into account the space required for bicycles larger than standard bicycles.

Buildings that are not typically accessed by bicycles shall have as many bicycle parking spaces as is appropriate.

Section 5c

Non-residential buildings with more than five parking spaces undergoing major renovation

Non-residential buildings with more than five parking spaces and undergoing major renovation shall:

1) be equipped with at least one recharging point for every five car parking spaces;

2) be equipped with pre-cabling for at least 50 per cent of the car parking spaces and ducting for the remaining car parking spaces; and

3) provide bicycle parking spaces amounting to at least 15 per cent of the building's average user capacity or 10 per cent of its total user capacity, taking into account the space required for bicycles larger than standard bicycles.

Buildings that are not typically accessed by bicycles shall have as many bicycle parking spaces as is appropriate.

Existing Act

Proposal

Section 5d

New office buildings with more than five car parking spaces

By way of derogation from section 5b, subsection 1, paragraph 1 of this Act, new office buildings with more than five car parking spaces shall be equipped with at least one recharging point adjacent to the building for every two car parking spaces.

Section 5e

Office buildings with more than five car parking spaces undergoing major renovation

By way of derogation from section 5c of this Act, office buildings with more than five car parking spaces and undergoing major renovation shall be equipped with at least one recharging point adjacent to the building for every two car parking spaces.

Section 6

Equipping a building undergoing major renovation with electric vehicle recharging points recharging point capabilities

Parties undertaking a construction project shall ensure that electric vehicle recharging points or recharging point capabilities are designed and installed adjacent to the building in accordance with this Act if the major renovation is subject to a construction permit pursuant to section 42 of the Construction Act.

A residential building with more than four car parking spaces and undergoing major renovation shall be equipped with recharging point capabilities adjacent to the building so that a recharging point can be installed in each parking space at a later date.

A non-residential building with more than 10 car parking spaces and undergoing major renovation shall be equipped with one high-power recharging point adjacent to the building, or alternatively:

- 1) at least one normal-power recharging

New residential buildings with more than three car parking spaces

New residential buildings with more than three parking spaces shall:

1) be equipped with at least one recharging point;

2) be equipped with pre-cabling for at least 50 per cent of the car parking spaces and ducting for the remaining car parking spaces; and

3) provide at least two bicycle parking spaces for every residential building unit.

When granting a construction permit, the local building supervision authority may, for special reasons, adapt the requirements concerning the number of bicycle parking spaces.

Existing Act

Proposal

point if there are 11 to 50 car parking spaces;

2) at least two normal-power recharging points if there are 51 to 100 car parking spaces;

3) at least three normal-power recharging points if there are more than 100 car parking spaces.

In addition to the provisions of subsection 3, a non-residential building with 11 to 30 car parking spaces shall be equipped with recharging point capabilities adjacent to the building for at least 50 per cent of the car parking spaces. If there are more than 30 car parking spaces, recharging point capabilities shall be installed in at least 20 per cent of the car parking spaces, provided that at least 15 car parking spaces have recharging points. If a car parking space is equipped with a recharging point, it meets the requirement for the recharging point capability of the car parking space.

The provisions of subsections 2 to 4 shall apply to buildings in which:

1) the car parking spaces are located in the building, and the renovation covers the parking spaces or the electrical system of the building; or

2) the car parking spaces of the building are located on the property on which the building is located, and the renovation covers the car parking spaces or the electrical system of the parking spaces.

Section 6a

Residential buildings with more than three parking spaces undergoing major renovation

Residential buildings with more than three parking spaces and undergoing major renovation shall:

1) *be equipped with pre-cabling for at least 50 per cent of the car parking spaces and ducting for the remaining car parking spaces; and*

2) *provide at least two bicycle parking spaces for each residential building unit.*

Existing Act

Proposal

When granting a construction permit, the local building supervision authority may, for special reasons, adapt the requirements concerning the number of bicycle parking spaces. If ensuring two bicycle parking spaces for every residential building unit is not possible in major renovations, the building shall have as many bicycle parking spaces as is appropriate.

Section 9

Section 9

Requirements for electric vehicle recharging points and recharging point capabilities

Technical *requirements for electric vehicle recharging points and recharging point capabilities*

The recharging points referred to in sections 5 to 8 above shall be normal-power or high-power recharging points with the technical characteristics specified in Annex II to the Alternative Fuels Infrastructure Regulation.

The recharging point capabilities referred to in sections 5, 6 and 8 above shall be such that a recharging point complying with the technical specifications referred to in subsection 1 can be installed in the car parking space at a later date.

The recharging points referred to in sections 5 to 7 above may also be publicly accessible recharging points within the meaning of Article 2, point (45), of the Alternative Fuels Infrastructure Regulation.

At least one of the recharging points referred to in section 5, subsection 3 and section 6, subsection 3 that are available for public use shall be installed in a car parking space that is at least 3.6 metres wide and at least 5.0 metres long.

The recharging points referred to in *this Act* shall be *capable of smart recharging and bi-directional recharging if this is technically feasible.*

The pre-cabing and ducting installed under this Act shall be dimensioned so as to enable the simultaneous and efficient use of the required number of recharging points. The dimensioning shall, where necessary, support the installation of a load or recharging management system, to the extent that this is technically and economically feasible and justifiable.

The recharging points referred to in *this Act* may also be publicly accessible recharging points within the meaning of Article 2, point (45), of the Alternative Fuels Infrastructure Regulation.

At least one of the recharging points referred to in *sections 5b and 5c* above that are available for public use shall be installed in a car parking space that is at least 3.6 metres wide and at least 5.0 metres long.

Existing Act

Proposal

Section 10

Section 10

Exemption concerning electric vehicle recharging points and recharging point capabilities

Exemption concerning the cost of major renovation of a building

The provisions of section 5, subsections 3 and 4, section 6, subsections 3 and 4, and section 7 shall not apply to the installation of recharging points or recharging point capabilities adjacent to buildings owned and occupied by microenterprises as defined in Commission Recommendation 2003/361/EC concerning the definition of micro, small and medium-sized enterprises.

Sections 5, 5a, 5c, 5e and 6a of this Act shall not apply if the costs of installing recharging points and ducting exceed at least 10 per cent of the total cost of major renovation of a building.

Chapter 3

Chapter 3

Building automation and control systems

Building automation and control systems

Section 11

Section 11

Equipping a new building with a building automation and control system

*Equipping **non-residential buildings** with a building automation and control system*

Parties undertaking a construction project shall ensure that a building automation and control system is designed and installed in the building if the building is a new non-residential building the construction of which is subject to a construction permit pursuant to section 42 of the Construction Act. The automation and control system shall be installed in a building in which the rated output of the heating system or combined space heating and ventilation system exceeds 290 kW and in a building in which the rated output of the air-conditioning system or combined air-conditioning and ventilation system exceeds 290 kW.

The owner of a building shall ensure that an occupied non-residential building

- 1) *in which the effective rated output for the heating system or combined space heating and ventilation system exceeds 290 kW;*
- 2) *in which the effective rated output for the air-conditioning system or combined air-conditioning and ventilation system exceeds 290 kW;*
- 3) *is equipped with a building automation and control system.*

By 1 January 2029, the owner of a building shall ensure that an occupied non-residential building

- 1) *in which the effective rated output for the heating system or combined space heating and ventilation system exceeds 70 kW;*
- 2) *in which the effective rated output for the air-conditioning system or combined air-conditioning and ventilation system exceeds 70 kW;*

Existing Act

Proposal

Section 12

Equipping a building undergoing renovation and alteration work with a building automation and control system

When applying for a construction permit pursuant to section 42 of the Construction Act for the renovation or alteration of a heating or air-conditioning system in a non-residential building, the party undertaking the project shall ensure that a building automation and control system is designed and installed in the building. The automation and control system shall be installed in a building in which the rated output of the heating system or combined space heating and ventilation system exceeds 290 kW and in a building in which the rated output of the air-conditioning system or combined air-conditioning and ventilation system exceeds 290 kW.

Section 13

Equipping an existing building with a building automation and control system

Building owners shall ensure that an occupied non-residential building in which the effective rated output of the heating system or combined space heating and ventilation system exceeds 290 kW is equipped with a building automation and control system by 31 December 2024 at the latest.

Section 12

Equipping new residential buildings and those undergoing major renovation with monitoring and control functionalities

New residential buildings and those undergoing major renovation shall have:

- 1) the functionality of continuous electronic monitoring that measures systems' efficiency and informs building owners or managers in the case of a significant variation and when system servicing is necessary;*
- 2) effective control functionalities to ensure optimum generation, distribution, storage, use of energy and hydronic balance; and*
- 3) a capacity to react to external signals and adjust the energy consumption.*

Section 13

Equipping non-residential buildings with automatic lighting controls

Non-residential buildings with an effective rated output for heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation of over 290 kW shall be equipped with automatic lighting controls by 1 January 2028.

Non-residential buildings with an effective rated output for heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation of over 70 kW shall be equipped with automatic lighting controls by 1 January 2030.

The automatic lighting controls shall be suitably zoned and capable of occupancy detection.

Existing Act

Proposal

Section 14

Section 14

Requirements for building automation and control systems

Requirements for building automation and control systems

The building automation and control systems referred to in sections 11 to 13 above shall be capable of:

The building automation and control systems referred to in section 11 above shall be capable of:

- 1) continuously monitoring, logging, analysing and allowing for adjusting energy use;
- 2) benchmarking the building's energy efficiency, detecting losses in efficiency of technical building systems, and informing the person responsible for the facilities or technical building management about opportunities for energy efficiency improvement; *and*
- 3) allowing communication with connected technical building systems and other appliances inside the building, and being interoperable with technical building systems across different types of proprietary technologies, devices and manufacturers.

- 1) continuously monitoring, logging, analysing and allowing for adjusting energy use;
- 2) benchmarking the building's energy efficiency, detecting losses in efficiency of technical building systems, and informing the person responsible for the facilities or technical building management about opportunities for energy efficiency improvement;
- 3) allowing communication with connected technical building systems and other appliances inside the building, and being interoperable with technical building systems across different types of proprietary technologies, devices and manufacturers; *and*
- 4) *monitoring indoor environmental quality.*

Section 15

Section 15

*Exemption from the obligation to install a **building automation and control system***

Derogations from the installation obligation

The provisions of sections 12 and 13 shall not apply if:

The provisions of *section 11* shall not apply if:

- 1) the installation of a building automation and control system is not technically or economically feasible;
- 2) *the heating or air-conditioning system of the building is not of a type that can be controlled automatically; or*
- 3) the requirements of section 14 may be met by a combination of several systems, which may also be connected to several buildings.

- 1) the installation of a building automation and control system is not technically or economically feasible; *or*
- 2) the requirements of section 14 may be met by a combination of several systems, which may also be connected to several buildings.

The provisions of section 12 shall not apply if the installation of monitoring and control functionalities is not technically, economically or functionally feasible.

The provisions of section 13 shall not apply

Existing Act

Proposal

Section 15a

Exemption of certain buildings from the inspection requirement

The inspection requirements laid down in Article 14, paragraph (1), and Article 15, paragraph (1), of Directive 2010/31/EU of the European Parliament and of the Council on the energy performance of buildings, as amended by Directive (EU) 2018/844 of the European Parliament and of the Council, shall not apply to:

- 1) buildings that meet the requirements of sections 11 to 14; nor
- 2) residential buildings with:
 - a) the functionality of continuous electronic monitoring that measures systems' efficiency and informs building owners or managers in the case of a significant variation or when system servicing is necessary; and
 - b) effective control functionalities to ensure optimum generation, distribution, storage and use of energy.

Chapter 4

Authorities and supervision

Section 17

Supervisory authority

The Finnish Transport and Communications Agency Traficom shall be responsible for monitoring compliance with section 7.

Section 15a

Exemption of certain buildings from the inspection requirement

The inspection requirements laid down in Article 23, paragraph (1), of Directive (EU) 2024/1275 of the European Parliament and of the Council on the energy performance of buildings shall not apply to:

- 1) buildings that meet the requirements of sections 11 to 13; nor
- 2) residential buildings with:
 - a) the functionality of continuous electronic monitoring that measures systems' efficiency and informs building owners or managers in the case of a significant variation or when system servicing is necessary; and
 - b) effective control functionalities to ensure optimum generation, distribution, storage and use of energy.

Chapter 4

Authorities and supervision

Section 17

Supervisory authority

The Finnish Transport and Communications Agency Traficom shall be responsible for monitoring compliance with section 5.

Existing Act

Proposal

Section 18

Section 18

Right to carry out inspections

Right to carry out inspections

The Finnish Transport and Communications Agency Traficom shall have the right, for the purposes of monitoring compliance with section 7, to enter any area, flat or other premises to which access is necessary for the purposes of monitoring, and to carry out inspections there in connection with such monitoring. However, the right of inspection does not extend to premises used for permanent housing. Inspections shall comply with section 39 of the Administrative Procedure Act (434/2003).

The Finnish Transport and Communications Agency Traficom shall have the right, for the purposes of monitoring compliance with *section 5*, to enter any area, flat or other premises to which access is necessary for the purposes of monitoring, and to carry out inspections there in connection with such monitoring. However, the right of inspection does not extend to premises used for permanent housing. Inspections shall comply with section 39 of the Administrative Procedure Act (434/2003).

Section 19

Section 19

Coercive measures

Coercive measures

If the owner of a building fails to comply with the obligation laid down in section 7 to install a recharging point, the Finnish Transport and Communications Agency Traficom shall require the owner to rectify the situation within a specified time limit. If the recharging point is not installed within the deadline, Traficom shall order the building owner to install the recharging point within a new deadline set by Traficom.

If the owner of a building fails to comply with the obligation laid down in *section 5* to install a recharging point, the Finnish Transport and Communications Agency Traficom shall require the owner to rectify the situation within a specified time limit. If the recharging point is not installed within the deadline, Traficom shall order the building owner to install the recharging point within a new deadline set by Traficom.

This Act shall enter into force on xx xx 20xx.
