

Method note — Energy decency through the building (OneDpe)

Document for the press. Edition of 15 October 2026. Counts established on the full dump of the public energy performance certificate (EPC, French DPE) database of ADEME, the French environment agency, **dump of 25 August 2026**, processed locally. Primary sources consulted on **12 October 2026** — each source carries its date in § 11. Contact: Steven Annonziata — presse@onedpe.fr

This note is the reference for every number published by the study: press page, press releases, articles and figures. Every number in those texts is found here, or in our data files, available on request. Three kinds of figure coexist and do not mix: **counts measured** in the ADEME database (§ 2 to § 6), **measured minimums** for social housing (§ 7) and **estimates** scaled to the housing stock (§ 8). Our headlines and standfirsts never carry an estimate, and the study's questions are never added together.

1. What the study measures

1.1 The simulated rule

The study measures a provision of the French housing bill, the **projet de loi relance et décentralisation du logement**, in the version **adopted by the Senate on 8 July 2026** (adopted text no. 157, accelerated procedure). Its article 6 adds to article 6 of Law no. 89-462 of 6 July 1989 a section III that opens: "By way of derogation from II of this article, the home is considered decent in terms of energy performance where at least one of the following conditions is met". Its point 6°, from amendment no. 380 rect. ter, covers the home "located in a collective residential building whose energy performance certificate referred to in article L. 126-31 of the Construction and Housing Code establishes that the building reaches the level of energy performance required for the home under II of this article" (our translation).

Our reading: **the home's own EPC still exists, and the home is considered decent in terms of energy performance if its building's collective EPC reaches the required level**. The building's EPC is a second route; it does not replace the home's class, which remains that of its own certificate.

1.2 This is not the law

It is a bill going back and forth between the two chambers. The economic affairs committee of the National Assembly **rewrote** this provision on 22 September 2026 (text no. 3188); corrections have been announced for the floor debate, which is not on the agenda as of 12 October 2026. Our study measures the rule "if the building's EPC reaches the level, all its homes are considered decent". It says what that rule would do, if the bill is adopted in that version; it gives no opinion on the reform.

Two vocabulary rules follow. We write "considered decent in terms of energy performance", never "deemed decent". And decency only concerns let homes: for an owner-occupied home we write "whose building reaches the required level".

1.3 The timetable applied

In mainland France: a G-rated home has not been decent since 1 January 2025; F from 1 January 2028; E from 1 January 2034; D or better, decent with no date. Hence three horizons:

HORIZON	HOMES CONCERNED (CLASS OF THEIR OWN EPC)	BUILDING THAT "REACHES THE REQUIRED LEVEL"
1 January 2027	G	class F or better
1 January 2028	F or G	class E or better
1 January 2034	E, F or G	class D or better

All classes for these three horizons are **recalculated under the 1.7 factor (applicable from 1 January 2027)**, for **all** existing EPCs (§ 4). That last point is an **assumption of the study**, not a rule of law: the ministry announced, in a press release of 31 August 2026, that the update of existing EPCs would be free and immediate, and we assume it will have been made for every EPC at all three horizons.

2. Data and population

Source. ADEME database of EPCs for existing homes (since July 2021), full dump of 25 August 2026, Licence Ouverte 2.0, loaded into a local database. The calculation chain is versioned and available on request.

Population. EPCs that are neither of the old method (2012), deactivated nor being deleted, issued since 1 July 2021, still valid on 25 August 2026, excluding commercial premises: **16,889,683 valid EPCs**. We keep flats and buildings: 11,460,130 flat EPCs and **430,120 building EPCs**. Both sets still cover the whole of France and every construction period: the scope of published counts, below, restricts them.

Flat de-duplication. The same flat can carry several valid EPCs. We keep one per key "same address × same address complement × same floor area (to 0.1 m²) × same typology", the most recent (issue date, then number). **10,354,488 flats** remain, of which 1,398,873 rated E, 436,352 rated F and 213,069 rated G on their published class, i.e. 2,048,294 flats rated E, F or G: the set from which classes are recalculated (§ 4).

Scope of published counts. Mainland France; flats whose construction period is not after 2012; building subject to the collective EPC obligation of article L. 126-31 (§ 3.3). Counts cover **assessed flats** in the database, not the housing stock, and the EPC does not say whether the home is let.

3. Finding each flat's building

3.1 Buildings (partition and rule D2)

The 430,120 building EPCs are grouped into **362,420 buildings** by a strict partition: two EPCs belong to the same building if they are linked by a replacement chain, or if they carry the same address and the same signature "floor area × number of flats × number of storeys". A building's class is that of its **most recent EPC** (rule D2).

3.2 The three blocks of flats

BLOCK	FLATS	HOW THE BUILDING IS FOUND
(a) generated units (flat EPCs derived from the building's collective EPC) carrying a building number	438,408	the building EPC declared as parent (rule C1); if the building carries several generating parents, a unit is kept only if its declared parent is the building's most recent EPC (rule C2: 40,424 units removed)
(a') units "generated from building EPC data" with no building number	3,678	by address, counted as generated
(b) flats assessed individually	1,606,208	by address; an address carrying several buildings is not assessable

What happens to the E, F or G flats of each block:

STATUS	(A)	(A')	(B)
no building EPC found	22,688	1,135	1,336,485
address carrying several buildings (not assessable)	–	1,483	56,557
building outside the scope of article L. 126-31	1,837	22	20,212

Also set aside: 370 flats in overseas territories, 2,861 flats built after 2012 and the 40,424 duplicates of rule C2. **Of the 1,606,208 E, F or G flats assessed individually, 1,336,485 have no building EPC found at their address in the database.**

Consequence of rule C1. A generated unit takes the class of the building EPC declared as its parent, which is not always the building's most recent EPC, whereas a flat assessed individually takes the class of the most recent EPC (D2). The same building can therefore appear in two groups at the same horizon, and **building counts do not add up** (§ 5.2).

3.3 Eligible buildings (rule D3)

A building enters the study only if it falls under the collective EPC obligation of article L. 126-31: building permit before 1 January 2013 (read from the construction period), more than two units (a building whose number of units is unknown is kept), mainland France. That obligation has applied since 2024 to buildings of more than 200 units, since 2025 to those of 50 to 200 units, and since 2026 to those of 50 units or fewer.

283,825 eligible buildings carry a building EPC in the database. On their most recent EPC and under the 1.7 factor, **16.4% are class E, 5.6% class F and 2.0% class G** (46,681, 15,910 and 5,779 buildings); under the 1.9 factor, 6.6% were class F and 2.8% class G (18,810 and 7,981).

A building EPC is **usable** for a flat when the building is found, unique at the address and eligible.

4. Classes: harmonisation to the 1.9 and 1.7 factors

Why. The database mixes EPCs issued under the 2.3 factor with EPCs issued or recalculated under the 1.9 factor (order of 13 August 2025). The study's horizons are read under the 1.7 factor, for all existing EPCs (assumption, § 1.3): every EPC, for a flat or a building, is therefore reclassified.

Method. Moving from one factor to another uses an identity on the published consumption figures, checked on the EPCs for which ADEME kept both states (table below):

1. bring to the 1.9 factor: for EPCs still at 2.3, $EP_{1.9} = EP - (4/13) \times (EP - EF)$, where EP is primary energy and EF final energy consumption (5 uses, per m²); EPCs already recalculated by ADEME or issued at 1.9 are taken as they are; 2. move to the 1.7 factor by the same identity: $EP_{1.7} = EP_{1.9} - (2/9) \times (EP_{1.9} - EF)$; 3. reclassify with the statutory scale (floor area, altitude, climate zone), **leaving greenhouse gas emissions unchanged**: the class remains the worse of the two scores. For 414,881 EPCs, the class under the 1.7 factor stays that of the 1.9 factor because it is set by emissions (consumption alone would give a better class).

Regimes found across 2,478,414 EPCs (430,120 for buildings and 2,048,294 E, F or G flats): 2,151,832 recalculated by ADEME at 1.9; 311,783 issued at 1.9; 14,762 rebuilt from 2.3; 23 that cannot be rebuilt and 4 without electricity, kept as they are; 10 with no primary energy, kept at their published class.

The two checks that could have blocked publication (thresholds written before measuring):

CHECK	RESULT	THRESHOLD
The scale returns the published class from the published consumption	2,469,279 out of 2,478,404, i.e. 99.632%	99.5%
On EPCs for which ADEME kept both states, the 2.3 → 1.9 rebuild returns the consumption to within 1 kWh/m ²	2,150,146 out of 2,151,755, i.e. 99.925%	—
... and the class recalculated by ADEME	2,140,653 out of 2,151,755, i.e. 99.484%	99%

Both checks passed. Classes under the 1.7 factor are **harmonised** classes: not the ones re-issued EPCs will display, but the ones the same method gives when applied to all.

5. The three horizons

5.1 On 1 January 2027: back on the market

Of **161,537 flats rated G** under the 1.7 factor, **27,007** have a usable building EPC (16.7%). Of these, **19,057** are in a building of class F or better: they would be considered decent in terms of energy performance thanks to their building's EPC, and could return to the rental market. They are in **10,724 buildings**. The other 7,950 are in a building itself rated G. For the remaining 134,530 (83.3%), no usable collective EPC was found in the database (§ 3.2: building not found at the address, address carrying several buildings, building outside the scope of article L. 126-31).

Reading under the 1.9 factor (control figure, not used in the press release). Had the rule applied on the date of the dump, under the 1.9 factor then in force, the count would be **22,949** G-rated flats (12,676 buildings), out of 33,673 G-rated flats with a usable building EPC and 208,175 G-rated flats. The public figure is the 1.7 one, because the rule could not come into force before 2027.

5.2 On 1 January 2028: F stops being decent

Of **530,212 flats rated F or G** under the 1.7 factor, **119,213** have a usable building EPC. They split as follows:

- building class E or better, EPC still valid on 1 January 2028: **54,783** flats (46.0%, **23,621**

buildings), considered decent in 2028 thanks to the building;

- building class F: **52,087** flats (43.7%) in **7,476** buildings, which would need works before 1

January 2028 for these homes to stay considered decent through the building. Of these, **6,815** G-rated flats are considered decent from 2027 thanks to the building (§ 5.1), and **45,272** F-rated flats are decent in their own right until 2028;

- building class G: **12,343** flats (10.4%, 2,536 buildings): the rule changes nothing for them.

Building counts do not add up. A building can appear in two of these groups: a generated unit is attached to the building EPC declared as its parent (C1), a flat assessed individually to the building's most recent EPC (D2). Hence $23,621 + 7,476 + 2,536 = 33,633$ buildings, for 33,613 assessable buildings.

5.3 On 1 January 2034: E stops being decent, with an unchanged EPC

Of **1,708,572 flats rated E, F or G** under the 1.7 factor, **510,862** have a usable building EPC:

- building class D or better: **111,633** flats (21.9%, **35,291** buildings), considered decent in 2034

thanks to the building;

- building class E: **307,685** flats (60.2%) in **28,336** buildings, which would need works before

1 January 2034 for the same reason. Of these, **34,689** F or G-rated flats are considered decent from 2028 to 2033 thanks to the building;

- building class F or G: 91,544 flats (17.9%): the rule changes nothing for them.

Nearly three times as many flats rated E, F or G are in a class E building (307,685) as in a building thanks to which they would be considered decent (111,633).

The "unchanged EPC" assumption. The collective EPC must be renewed or updated every ten years (article L. 126-31): some of the building EPCs in the database will therefore have been redone by 2034. We assume the building redoes its collective EPC at the same class. A building that carries out works leaves this count. **Variant:** keeping only building EPCs still valid on 1 January 2034, the count of flats considered decent thanks to the building is 86,326 (28,569 buildings).

5.4 The overall table, by building class

Assessed flats with a usable building EPC, classes under the 1.7 factor:

CLASS OF THE BUILDING'S EPC	2027: G-RATED FLATS	2028: F OR G-RATED FLATS	2034: E, F OR G-RATED FLATS
A to D	4,845	20,094	
E	7,397	34,689	
F	6,815	52,087	
G	7,950	12,343	
Total	27,007	119,213	

Reading: in 2027, G-rated flats in buildings of class A to F (19,057) are considered decent thanks to the building; in 2028, F or G-rated flats in buildings of class A to E (54,783); in 2034, E, F or G-rated flats in buildings of class A to D (111,633). Class F buildings in 2028 and class E buildings in 2034 are those that would need works for their homes to stay considered decent through the building. Columns do not add up: the same flat is counted at every horizon where its class is concerned.

Detail by building class and by flat class:

FLAT \ BUILDING	A	B	C	D	E	F	G
G	4	68	982	3,791	7,397	6,815	7,950
F	10	135	2,495	12,609	27,292	45,272	4,393
E	42	532	12,000	78,965	272,996	22,470	4,644

5.5 The composition of each result, by block

Each count brings together the three blocks of § 3.2:

RESULT	TOTAL	(A) GENERATED UNITS, BUILDING NUMBER	(A') GENERATED UNITS, NO NUMBER
Back on the market on 1 January 2027	19,057	5,451	11
Considered decent in 2028 thanks to the building	54,783	20,415	76
Building class F: works before 2028 (F or G-rated flats)	52,087	38,413	41
Considered decent in 2034 thanks to the building	111,633	48,835	343
Building class E: works before 2034 (E, F or G-rated flats)	307,685	247,148	505
Building class G in 2028 (the rule changes nothing)	12,343	5,942	0

Reading: among those who gain from the rule, flats assessed individually dominate (71.3% of the 19,057); on the works side, units generated from the building's EPC do (73.7% of the 52,087, 80.3% of the 307,685). A count of homes on the works side therefore weighs first the number of flats in the buildings concerned, which explains the gap between social housing shares by homes and by buildings (§ 7.2).

6. Coverage: what limits everything else

The rule can only work if the building has a collective EPC. In the database, that is rarely the case: **of 161,537 G-rated flats, only 27,007 have a usable building EPC found in the database (17%)**, and 1,336,485 of the 1,606,208 E, F or G flats assessed individually have no building EPC found at their address. The others mix addresses carrying several buildings, buildings outside the scope of article L. 126-31, unmatched addresses and collective EPCs carried out but missing from the database. Most buildings do not yet have a collective EPC in the database, despite the obligation (§ 3.3). The real effect of the rule therefore depends first on how that obligation is applied: this is what the estimates in § 8 address.

7. Social housing: measured minimums

7.1 Method

Each building concerned is matched against the **register of rental homes of social landlords (RPLS)** of the French statistical service for the environment and housing (SDES), stock on 1 January 2025, released on 20 January 2026 (5,416,826 homes):

1. by address, with three keys tried in order (strict, without repetition index, by municipality); 2. for an unmatched building, by an RPLS point 30 m away or less **on the same street** and, if the EPC carries a number, at the same number. Proximity alone is rejected: a placebo (points shifted by 300 m) gives 9.3% false matches at 30 m, against 0.03% for the rule used; 3. through the **national address base (BAN)**: both addresses, geocoded to the house number with a score of at least 0.6, must carry the same address identifier. On 970 control buildings already matched by address, the BAN returns the same address in 952 cases (98.1%).

A building is called **fully social** when its collective homes in RPLS amount to at least 80% of its flats.

7.2 Results (measured minimums, with the BAN)

By number of assessed homes:

GROUP	FLATS	IN A BUILDING WITH SOME SOCIAL HOUSING	IN A FULLY SOCIAL BUILDING
Back on the market on 1 January 2027	19,057	at least 23.0%	at least 12.6%
Considered decent in 2028 thanks to the building	54,783	at least 30.7%	at least 14.6%
Building class F: works before 2028	52,087	at least 54.9%	at least 26.9%
Considered decent in 2034 thanks to the building	111,633	at least 38.2%	at least 17.2%
Building class E: works before 2034	307,685	at least 57.0%	at least 22.6%

Without the BAN step, the same shares are 21.1%, 28.5%, 50.8%, 35.3% and 51.8% (building with some social housing) and 11.6%, 13.5%, 24.5%, 15.9% and 20.3% (fully social).

By number of buildings:

GROUP	BUILDINGS	WITH SOME SOCIAL HOUSING	FULLY SOCIAL
Back on the market on 1 January 2027	10,724	at least 18.9% (2,028)	at least 11.3% (1,212)
Considered decent in 2028 thanks to the building	23,621	at least 23.9% (5,635)	at least 13.5% (3,193)
Building class F: works before 2028	7,476	at least 23.5% (1,760)	at least 15.3% (1,143)
Considered decent in 2034 thanks to the building	35,291	at least 31.7% (11,180)	at least 17.7% (6,237)
Building class E: works before 2034	28,336	at least 29.8% (8,448)	at least 16.3% (4,616)

Building counts do not add up from one row to another (rule C1, § 3.2).

Why minimums. Absence from the register does not prove a building is not social: matching misses addresses, residential hostels and non-subsidised homes of semi-public companies are not in it, and dates differ (RPLS on 1 January 2025, EPCs from 2021 to 2026). The recall of the matching, measured on 863 certainly-social addresses (EPCs carrying an RPLS number), is **78.9%** with the BAN (72.0% without); 91.2% for the 692 addresses carrying a number (82.5% without).

Estimated range (control figure, not used in the press release). Dividing the measured share by the recall (78.9% for the upper bound, 91.2% for the lower bound), the share of flats in a building with some social housing would be 25.2% to 29.1% for the return to the market, 33.6% to 38.9% for homes considered decent in 2028, 60.2% to 69.6% for works before 2028, 41.9% to 48.4% for homes considered decent in 2034 and 62.5% to 72.2% for works before 2034. This is an **estimate**: it assumes our buildings escape matching as often as the control sample, 383 of whose 863 addresses are in the Morbihan département.

Reading. By number of buildings, the share with some social housing is comparable between those who gain from the rule and those that would need works (from 18.9% to 31.7%). By number of assessed homes, it exceeds half on the works side, because the social buildings concerned are large and their units are most often generated from the building's EPC (§ 5.5); at least one home in five is in a fully social building there. These are minimums, and how decency applies to social housing is not covered by the study.

SDES release rules: no statistic by landlord; no cell of fewer than 11 RPLS homes; no list of buildings; building-level detail never leaves our machines.

8. Estimates scaled to the private rental stock

This whole section is an order-of-magnitude **estimate**, presented in second rank: our headlines and standfirsts do not carry it. The five questions do not add up (they overlap on the home side).

8.1 Scope and anchors

Scope: flats in the **private rental stock** built before 2013, mainland France, **including homes provided free of charge**, which belong to the official SDES "private rental" scope (the variant excluding them is given in § 8.5).

Anchors: the housing stock by energy performance class on 1 January 2025 published by SDES and the national energy renovation observatory (ONRE), under the 2.3 factor: private rental flats by class, heating energy, building status (co-ownership or single ownership), co-ownership size and construction period. These anchors are reclassified to the 1.9 and then 1.7 factors with transition matrices **measured** on the flats assessed individually in the database, energy by energy. Anchors reclassified under the 1.7 factor: 136,726 G-rated flats, 279,829 F, 754,677 E.

8.2 The three methods, and the published range

- **A, "at current collective EPC coverage":** the anchor is multiplied by the share of assessed flats

whose building meets the condition, **with the collective EPCs already filed on 25 August 2026** (share computed by construction period).

- **B and C, "if every co-ownership had its collective EPC"**: the share measured only among flats whose

building has a usable EPC is applied, as if undiagnosed buildings resembled diagnosed ones. C corrects B for co-ownership size; the gap between B and C stays below 5% on every question (size does not drive the result). It is a **potential**, not an expected outcome.

The published range runs from A to C. **Fully social** buildings are removed from the central value; the bounds in brackets cover the social-housing variants and, for 2034, two assumptions on E-rated flats missing from the database.

8.3 Results (estimates; private rental flats built before 2013)

QUESTION (1.7 FACTOR)	A, CURRENT COVERAGE	B	C, IF EVERY CO-OWNERSHIP HAD ITS COLLECTIVE EPC
Back on the market on 1 January 2027 (G)	11,327 [10,483 – 12,120]	110,035	111,803 [110,901 – 112,806]
Considered decent in 2028 thanks to the building (F or G)	27,360 [24,763 – 29,600]	257,474	265,550 [260,234 – 269,400]
Building class F: works before 2028	12,006 [11,491 – 12,543]	106,910	102,058 [100,368 – 105,547]
Considered decent in 2034 thanks to the building, unchanged EPC (E, F or G)	46,534 [40,010 – 53,142]	431,591	453,967 [436,514 – 477,002]
Building class E: works before 2034	48,388 [44,938 – 51,846]	440,031	434,643 [428,134 – 447,921]

If every co-ownership had its collective EPC, the effect would be eight to ten times larger than at current coverage. 2034 variant with a building EPC still valid on 1 January 2034: A 40,323, C 390,584. Return to the market under the 1.9 factor (control figure, not used in the press release): A 13,499, C 133,113.

Co-ownerships. Scaled to the national register of co-ownerships (RNIC, 648,481 co-ownerships in mainland France, of which 448,202 certainly built before 2013), the number of class F co-ownerships, if all had their collective EPC, would be **25,000 to 35,000** (25,389 to 34,791); class E, **74,000 to 100,000** (74,063 to 101,757). This is an estimate: a registered co-ownership is not a building, and single-owner buildings have no anchor. For reference, the measured counts: 7,476 class F buildings and 28,336 class E buildings house at least one flat concerned. They do not compare directly with the 15,910 and 46,681 eligible buildings rated F and E in § 3.3: those are classed by their most recent EPC (D2), whereas a generated unit takes the class of the EPC declared as its parent (C1), which may be older.

8.4 The benchmark, and the criterion revised after measurement

Before any calculation, criteria were written to decide whether the reclassified counts could be published. The benchmark applies our exit rates from classes F and G, measured by energy, to the official private rental stock under the 2.3 factor, and compares the result with the official figure under the 1.9 factor (871,000 energy sieves in the private rental stock, SDES/ONRE publication).

CRITERION	STATEMENT	RESULT
K1 (blocking)	total within $\pm 10\%$ of 871,000 (783,900 to 958,100)	856,053, i.e. -1.72% : met
K2 (blocking, written before measuring)	exit-rate gaps by energy of the same sign for all four energies	not met
K2 revised (after measuring)	gap on electricity below 3 points	1.53 points: met
K3	no cell (class $\times$ stratum) below 1,000 homes, otherwise merged	merges made: G by period (1975 to 2012 grouped), G by co-ownership size (20-79 and 80 units or more grouped), F by period (1989 to 2012 grouped)
K4	gap between B and C below 10%	from -4.9% to $+4.8\%$: met
K5 (blocking)	the projection chain reproduces the counts of § 5 exactly	met
K6 (non-blocking)	estimate of E-rated flats missing from the database within $\pm 5\%$ by energy, checked on the class F range	not met for gas ($+5.2\%$) and heating oil ($+8.2\%$)

Exit rates from classes F and G between 2.3 and 1.9, by energy: electricity 46.93% against 45.40% in the official figure ($+1.53$ points); gas 4.99% against 4.33% ($+0.66$); heating oil 1.01% against 1.37% (-0.36); wood and heat networks 9.11% against 10.13% (-1.02).

What we did with the failure of K2, said plainly. Criterion K2, written before measuring, required our gaps to have the same sign for all four energies. They do not: two are positive, two negative. The rule written in advance then required publishing only upper bounds under the 2.3 factor, or no projection at all. **On 12 October 2026, after seeing this result, the publisher replaced K2 with the criterion already used in our study on the electricity conversion factor (OneDpe, 25 August 2026): a gap on electricity below 3 points.** The measured gap is 1.53 points. This is an **after-the-fact** change to

a publication criterion; we flag it as such. Readers who hold to the original rule should keep only the measured counts of § 5 to § 7.

Consistency check, non-blocking: our rates give 280,000 exits from classes F and G between the 1.9 and 1.7 factors, against 275,000 (248,000 to 294,000) in our study and "about 300,000" in the official figure.

8.5 Assumptions and direction of bias

- **Database coverage.** A applies the coverage of 25 August 2026, and two biases pull in opposite

directions: individual EPCs follow sales and lettings, which may make A overstate; collective EPCs accumulate every week, which makes A understate for any date after the dump. The net direction is not measured.

- **B and C** assume undiagnosed buildings resemble diagnosed ones, at equal individual class and size.

This cannot be tested; no penalty is known for a missing collective EPC. It is a potential.

- **Anchors:** stock on 1 January 2025 under the 2.3 factor, occupancy status on 1 January 2022; the stock has improved somewhat since, hence a slight overestimate.

- **Social housing:** only fully social buildings are removed; the remaining social housing makes the private figure slightly overstated.

- **Homes provided free of charge:** included (official scope). Without them, the return to the market would be 10,620 (A) to 104,828 (C).

- **E-rated flats missing from the database** (an E under the 2.3 factor that became D at 1.9 is no longer in the export): estimated by inverse weighting; only 2034 is affected, and the range includes it.

8.6 What makes the projection possible, and what limits it

What makes it possible: an official anchor by type of home and by co-ownership size, and a benchmark on the conversion factor. What still limits it: the EPC does not say which home is let, and collective EPC coverage is not a random draw.

8.7 Secondary figure: the whole multi-unit stock

All occupancy statuses together (owner-occupiers, private and social tenants), flats used as main residences built before 2013, mainland France, the order of magnitude is about twice that of the private rental stock: a little less for the return to the market if every co-ownership had its collective EPC, nearly three times for 2034 at current coverage. SDES/ONRE anchors (supplementary data on 1 January 2025), reclassified under the 1.7 factor: 261,306 G-rated flats, 607,329 F, 1,766,315 E. The benchmark specific to this scope ($\pm 10\%$ of 1,029,000 energy sieves among flats) is met at -1.20% . No social building is removed.

QUESTION (ESTIMATES, ALL STATUSES)	A, CURRENT COVERAGE	C, IF EVERY CO-OWNERSHIP HAD ITS COLLEC
G-rated flats whose building is class F or better, on 1 January 2027	23,591	;
F or G-rated flats whose building is class E or better, in 2028	65,191	!
Building class F: works before 2028	25,421	;
E, F or G-rated flats whose building is class D or better, in 2034, unchanged EPC	130,942	1,067,699 (≈ 1.07 m:
Building class E: works before 2034	116,526	;

For an owner-occupied home we speak of neither decency nor market: we speak of a home whose building reaches the required level.

9. The limits, as we declare them

1. **This is not the law.** A bill still going between the chambers, whose provision has already been rewritten in committee at the National Assembly. If the rule changes, our counts change. 2. **Assessed, not the stock.** Counts cover the assessed flats of the ADEME database. The EPC does not say whether the home is let: "could return to the rental market" describes homes that would become lettable, not let homes. 3. **Harmonised classes.** Classes under the 1.7 factor are recalculated with a checked identity (§ 4), not read from re-issued EPCs. Applying them to all existing EPCs is an assumption of the study (§ 1.3). 4. **2034, unchanged EPC.** The building's class is assumed unchanged; a building that carries out works leaves the count. 5. **Matching.** An address carrying several buildings is not assessable (56,557 flats of block b); a building whose address differs from one EPC to another is not found; a generated unit takes the class of its declared parent, so building counts do not add up. 6. **Social housing.** Minimums; how decency applies to social housing is not covered. 7. **Estimates.** Orders of magnitude, assuming undiagnosed buildings resemble diagnosed ones, with a publication criterion revised after measuring (§ 8.4). 8. **What the study does not produce.** No figure by landlord, no list of buildings, no opinion on the reform.

10. Département annex

The file `decence-immeuble-departements.en.csv` (and its French version) gives, for each mainland département, the measured counts for the three horizons: flats concerned, of which with a usable building EPC, considered decent thanks to the building, and flats in a building that would need works (columns

flats_in_class_f_buildings_works_before_2028 and flats_in_class_e_buildings_works_before_2034). A cell of fewer than 11 homes is masked; a publishable cell is masked in turn when it alone would allow the first to be recovered by difference. No ranking, no municipality, no building. Département sums reconcile with the national counts before masking.

11. Primary sources, and their dates

SOURCE	WHAT WE TAKE FROM IT	REFERENCE	D
ADEME, EPC database for existing homes	All measured counts	full dump, Licence Ouverte 2.0	C A 2
French Senate, housing bill, adopted text no. 157	Article 6 of the bill, amending article 6 of Law no. 89-462 of 6 July 1989 (III, 6°): simulated rule	https://www.senat.fr/leg/tas25-157.html	a J C 1 2
National Assembly, committee text no. 3188 and report	Rewriting of point 6°	https://www.assemblee-nationale.fr/dyn/17/textes/l17b3188_texte-adopte-commission	C C S 2 C 1 2
Ministry, press release of 31 August 2026	Assumption of the study: all existing EPCs updated under the 1.7 factor (free and immediate update)	press release	3 2 C 1 2
SDES/ONRE, housing stock by energy performance class on 1 January 2025	Private rental anchors (data, tables 2, 4, 8, 9); benchmark (publication, table 2)	https://www.statistiques.developpement-durable.gouv.fr/le-parc-de-logements-par-classe-de-performance-energetique-au-1er-janvier-2025 ; https://www.statistiques.developpement-durable.gouv.fr/media/8809/download?inline ; https://www.statistiques.developpement-durable.gouv.fr/media/8813/download?inline	p M 2 C 1 2
SDES/ONRE, supplementary data	Whole multi-unit stock anchors	https://www.statistiques.developpement-durable.gouv.fr/media/8810/download?inline	p 1 M 2 C

SOURCE	WHAT WE TAKE FROM IT	REFERENCE	D
			1
			2
SDES, register of rental homes of social landlords (RPLS)	Social housing minimums	detailed home-level data, stock on 1 January 2025	r 2 2
Anah, national register of co-ownerships (RNIC)	Co-ownerships by size bracket and period	https://www.data.gouv.fr/datasets/registre- national-dimmatriculation-des-coproprietes	u a c 1 2
National address base (batch geocoding)	RPLS matching, step 3	https://data.geopf.fr/geocodage/	1 2

12. Where to read the study, and what to check it against

ITEM	WHERE
Press page of the study – release, figures, département annex, this note	onedpe.fr/en/presse/decence-energetique- par-1-immeuble-2026
Calculation files	on request from presse@onedpe.fr

Disclosure. Study produced by OneDpe (RIANN SAS), publisher of EPC analysis tools: the commercial interest is declared. Right of reply: droit-de-reponse@onedpe.fr, under article 6 IV of French Law 2004-575 of 21 June 2004.

OneDpe method note – Energy decency through the building, edition of 15 October 2026. Every number comes from the ADEME database dump of 25 August 2026 and from the primary sources cited above.