



# CAN CONSUMERS COUNT ON ENERGY PERFORMANCE CERTIFICATES?

Mystery shopping of energy performance  
certificates in Italy, Slovenia and Slovakia

# INTRODUCTION

There is a clear need for energy renovation in the European housing stock. It is indeed estimated that 75% of European buildings are currently insufficiently insulated. Scaling up housing retrofit works is not only necessary to meet our decarbonisation targets, but also the best option to reduce energy bills and increase people's comfort. The political awareness about the importance of housing renovation has greatly increased over the past years and the issues of energy and housing are increasingly seen as closely intertwined as shown by the appointment of a European Commissioner responsible for both matters in the new European Commission.

One crucial step in any housing renovation project is the establishment of a clear diagnosis about the energy performance of the property. The main tool to provide this diagnosis are 'Energy Performance Certificates' (EPCs). EPCs, which were introduced by EU legislation in 2009, function like the well-known EU energy label: they rate the level of energy performance of the home on an A (most energy-efficient) to G (worst-performing) scale.

Beyond retrofit works, EPCs are increasingly used in a wider range of housing-related policies. Several EU countries use EPCs as a tool to protect tenants in their national law. For instance, in Belgium, landlords are not authorised to increase the level of rent charged to their tenants if their property is rated in the lower energy classes. In France, since 1 January 2025, properties in EPC class G are no longer allowed to be rented out in the hope that owners will take the necessary steps to improve the insulation of their homes to the benefit of their tenants. Beyond tenants' laws, EPCs also play an increasingly important role in banks' decisions to

grant loans and mortgages for the purchase of a home. If a prospective buyer is interested in buying a poorly-insulated property, chances are that they will be offered less favorable conditions (i.e. a higher interest rate) than for the acquisition of a better-performing home. As a consequence, EPCs are also increasingly being used to determine the value of homes.

Given their important role in housing policies, it is essential for EPCs to be a reliable and trustworthy instrument. Unfortunately, many studies and investigations over the years have revealed significant shortcomings in the way EPCs have been implemented. Criticisms of EPCs concerned, for instance, the lack of harmonisation between different EU countries preventing comparison and financial institutions' full exploitation of the tool. More worryingly, research conducted by our members UFC-Que-choisir in France<sup>1</sup> and Which? in the United Kingdom<sup>2</sup> revealed that EPCs could be "riddled with inaccuracies" and that for the same property, an owner could receive very divergent EPCs assessments depending on the energy auditor performing the inspection.

Building on the experience from our French and British members, BEUC, together with its members in Slovakia, Italy and Slovenia, decided to conduct a mystery shopping project of EPCs in the three countries. The objective was to determine whether consumers looking to have their property's energy performance assessed could trust that they would obtain a reliable EPC together with useful indications about potential energy performance improvements.

The results of this research are summarised here below.

<sup>1</sup> <https://www.quechoisir.org/action-ufc-que-choisir-diagnostics-de-performance-energetique-du-grand-n-importe-quoi-encore-et-toujours-n103144/>

<sup>2</sup> <https://www.which.co.uk/policy-and-insight/article/why-gaps-in-the-data-from-epc-audits-leave-as-many-questions-as-answers-ajRIA3e7i8lW>

# METHODOLOGY

For our comparative analysis of EPCs, we implemented a structured mystery shopping methodology. This approach involves deploying trained or briefed individuals, known as mystery shoppers, who pose as typical customers to assess service quality and overall customer experience. Mystery shoppers follow a set script or checklist, focusing on specific evaluation criteria to ensure consistency across various locations or timeframes. During the process, mystery shoppers make careful observations, aligned with a checklist tailored to the investigation's objectives, such as customer service and compliance with service standards. After the visit, they submit detailed reports or questionnaires, which identify strengths and areas needing improvement, providing actionable insights for the research organisers.

For this study, we aimed to evaluate EPCs for three distinct types of properties, each representing a dif-

ferent construction period (one built around 1970 one between 1970 and 1990 and one after 1990 excluding new-builds). This selection allows us to consider differences in regulations, construction techniques, and insulation materials over time.

The methodological goal was to produce several EPCs for each house, completed by individual assessors who were unaware of the ongoing research (i.e., mystery shopping). In addition, a specialist performed a reference EPC for each house, with full awareness of the study's goals. This expert, an energy performance specialist, conducted a comparative analysis using the reference EPC as a baseline to evaluate the accuracy and consistency of the EPCs as mystery shopping results. This approach enabled a robust comparison of findings across the assessors' EPCs, benchmarked against the specialist's expert assessments.

## MAIN TAKEAWAY: EPCs CAN BE VERY RELIABLE TOOLS BUT THEIR QUALITY IS HIGHLY DEPENDENT ON THE ASSESSOR

Our mystery shopping of EPCs shows that there can be very significant variations in the quality and reliability of the ratings depending on which energy auditor performs the check. In the most extreme cases, differences in the energy performance class attributed by different auditors of the same property can vary by up to four classes (from C to G), meaning the difference between a very energy-efficient home and a very-poorly performing property. Variations were revealed in all the key features of a home's energy performance as well as the quality of the advice provided to consumers as to how they can improve their home's energy performance.

While these strong discrepancies in the performance of different energy auditors are clearly a cause for concern, our project also shows that an EPC analysis – when rightly performed – can be a very reliable and useful tool and act as a proper “health check” of a home by providing an objective picture of the energy performance and providing some concrete advice as to how to enhance it.



# FINDINGS MORE IN DETAIL

## 1 Very varying levels in the “rigorousness” of the inspection

While some variations in the way energy audits services are performed could be expected based on the level of experience/expertise of the energy auditor, for instance, one would normally expect a reasonably standardised approach. To go through all the neces-

sary steps of the inspection, one could expect a consistent service without wide variations in terms of time spent on the premises to perform the inspection or costs charged for the service.

### What our mystery shopping shows:

- Our members reported very significant variations in the way the energy audits services were performed. This was most striking in Italy where one of the auditors only spent 15 minutes to inspecting the house while the other auditors' inspection lasted 40 minutes on average. The extent of the inspection also varied significantly between the auditors: for instance, although this is required by law in Italy, only a few auditors went as far as opening the electrical outlet boxes and/or the window shutter boxes to inspect the composition of the wall layers. There were also some significant variations in the fees charged by energy auditors to perform the service with one auditor charging €100 while the most expensive ones charged more than €300. Our Italian member noticed a correlation between the cost of the service and the quality of the EPC. Finally, although our member did not test this service, it is possible for Italian consumers to 'self-certify' their home using an online certification service costing around €50: for this, consumers enter relevant data about their property themselves, and an EPC is issued. Sometimes a remote auditor performs a short online visit. Also in Slovenia, some energy auditors offered 'to remotely produce EPCs if this was urgent'. One can clearly see how such a system opens the door to completely unreliable EPCs.

## 2 In general, a trend to over-rely on written documentation

Before performing the physical inspection of a home, energy auditors generally prepare their visit by checking the documentation about the key characteristics of the property, such as the year of construction, the size of the home, the date of installation and technology of the heating device, the presence or not of cooling devices, and the potential renovation works/modifications to the house that occurred since the construction. In Italy for instance, an 'installation booklet' containing all the technical information related to the house and its relevant equipment (heating and cooling devices, renewable energy appliances etc.) must be provided to issue the EPC. This booklet must be prepared at the time of installation and carefully updated after that to take into account every relevant development (possible renovation works,

installation of a new heating device etc.) In Slovenia, energy auditors typically send questionnaires to their clients to collect the relevant information and cross-check it with land registry information (the so-called the 'GURS database') to get input on the size of the house, the year of construction, potential renovations/extensions etc.

One would expect that, to perform their work well, energy auditors should prepare their inspection using the available documentation and then cross-check it against reality. Where deviations are noticed (such as in the size of the property or the type of heating technology), energy auditors should correct the information and consider this to establish their EPCs.

### What our mystery shopping shows:

- Many energy auditors tend to rely excessively on the documentation provided before their inspection and do not systematically cross-check the information provided in the document during their visit. For instance, in the three countries, very often, energy auditors entered wrong data about the size of the homes they were inspecting. This can lead to substantial discrepancies in the assessment of the energy

efficiency of a building as EPC's indicators are expressed as specific values per heated area. In our test, differences between the real size and that indicated in the documentation remained rather marginal; therefore, it had little impact on the reliability of the EPC. However, one can assume that where such differences become bigger, the impact can be more significant and result in a misattribution of energy classes. In Italy, for all tested properties, there were gaps in the "installation booklet" with, for instance, the absence of reference to the presence of an air-conditioning system in one property. In this case, two of the five energy auditors who came for the inspection did not include the air-conditioning system in their assessment. This is a serious mistake as it contributed to a significant discrepancy in the attribution of the energy class. This should normally have been a relatively easy aspect to check for a professional auditor. One possible explanation for this mistake is that auditors intentionally overlooked the existence of equipment which was not registered in the installation booklet, as issuing an EPC on the basis of an incomplete documentation exposes them to an administrative fine.

3

### Some serious approximations, especially regarding heating and cooling technologies

Heating technology is responsible for most of a home's energy consumption. Hence, it plays an important role in the determination of an EPC. For instance, whether your house is heated with a fossil-fuel boiler or a heat pump plays an important role. Heat pumps, running on electricity (ideally renewable) translate into a higher energy class in the EPC.

To perform a high quality/trustworthy energy audit,

auditors therefore need to pay particular attention to heating and cooling devices. Where information is lacking (for instance about the year of installation of the device or its technology), energy auditors should check the heating system carefully. They should also verify the presence of other devices (such as air-conditioning systems, water heaters etc.) and include them in their assessment.

#### What our mystery shopping shows:

Unfortunately, also for the assessment of this very "basic" element of a property's energy performance, our members noticed significant variations. In Italy, for one particular property, auditors came up with different indications regarding the boilers' year of installation or their thermal power. Much more concerning: in Slovenia, one out of the three energy assessors systematically made mistakes regarding the technology of the heating device, indicating that one particular property was heated with a heat pump whereas it was heated with gas. The same assessor did not consider the energy used for lighting although this is mandatory. Unsurprisingly, this led this auditor granting a much higher energy class to the property compared to the two other tested assessors who gave a score close to the benchmark EPC. For another property, the same assessor gave again a misleading EPC because they made an incorrect assessment of the building's envelope and estimated that the water heater was only electric while the owner used a dual system with oil-fired water heating during the coldest months of the year.

4

### Varying levels of guidance on possible measures to improve energy efficiency

When drawing up an EPC, energy auditors are supposed to share guidance to their customers about what possible measures could be taken to improve the property's energy efficiency. Ideally, they should share several options, ranging from the 'low-cost'/'no-brainer' solutions – such as the ones promoted as

part of BEUC's STEP project to tackle energy poverty<sup>3</sup> – to the more structural insulation possibilities. In this sense, EPCs act as a kind of 'health check' of a property, giving a clear diagnosis of the state of the house together with concrete improvement recommendations.

<sup>3</sup> <https://www.stepenergy.eu/>

### What our test shows:

In Slovenia, where greater focus was put on this part of the EPC work, all assessors provided recommendations to their customers on possible measures to improve energy efficiency. However, only the reference/benchmark EPC went as far as providing a very comprehensive picture by providing the homeowners not only with concrete recommendations but also a detailed estimate of the potential costs of these measures and the likely return on investment. Further to this, the reference assessor also informed the homeowners about possible grants and subsidies they would be eligible for to finance the possible retrofit measures. The other assessors did provide some concrete recommendations, although with varying quality and details, but fell short of sharing these specific cost estimates and an overview of possible grants, which are essential factors in the decision-making process. In Italy, energy auditors only provided some very minor recommendations regarding potential energy efficiency improvements and none of them shared financial estimates of potential savings.

## WHAT WE MAKE OF THESE FINDINGS

Our mystery shopping exercise confirms that although energy performance certificates can be a very reliable and informative tool (as shown with the benchmark EPCs provided in Slovenia for instance), there can be significant disparities in the trustworthiness of the energy audit depending on the energy assessor. As the EU needs to drastically increase the pace of housing renovation, it is essential to ensure that the full potential of EPCs is tapped. For this, Member States should:

- **Implement random checks on energy assessors** more systematically and take more coercive measures for assessors failing to meet quality criteria.
- **Increase the number of accredited assessors by scaling up high quality training programmes for professionals.** Member States should ensure that more training opportunities are available and that relevant skills are taught. This requires training more trainers, who will then be able to educate the growing number of assessors. These efforts to strengthen training programmes could be coordinated by the European Commission's new '**Union of Skills**' action plan and notably by the planned roll-out of 'EU Skills Academies' which will aim at providing European businesses with a qualified workforce to implement the green transition.
- **Simplify the establishment of EPCs by reducing the administrative burden where necessary.** For instance, in Italy, the requirement to have fully up-to-date documentation on the heating and cooling appliances is a significant hurdle for consumers to obtain EPCs. More flexibility should be given to energy assessors to update the documentation/correct the missing information and bring installations back into compliance.
- **Use EPCs to share recommendations on how to improve the energy efficiency of a property:** as shown in the Slovenian example, EPCs can be most useful when providing concrete recommendations about possible energy efficiency improvements with a detailed estimate of the costs and potential savings. The EU's recently revised Energy Performance of Buildings Directive (EPBD) requires Member States to introduce 'renovation passports' which are long-term step-by-step renovation roadmaps to reach deep retrofit. In the implementation of the EPBD, Member States should make sure that they fully exploit the synergies between EPCs and these renovation passports.

Published in April 2025 by BEUC



The European Consumer Organisation  
Bureau Européen des Unions de Consommateurs  
Europäischer Verbraucherverband

Rue d'Arlon 80,  
B-1040 Bruxelles  
Tel: +32 (0)2 743 15 90  
[www.beuc.eu](http://www.beuc.eu)

Contact: [energy@beuc.eu](mailto:energy@beuc.eu)



Co-funded by the European Union