

EU Taxonomy Verification in Austria (ÖGNI) - Insights

CONSTRUCTION and REAL ESTATE ACTIVITIES

ÖGNI Third-Party-Verification

05.03.2026 / spotlights (11-12) - online

Speaker



Mag. (FH) Petra Kühnel

Head of EU Taxonomy Department

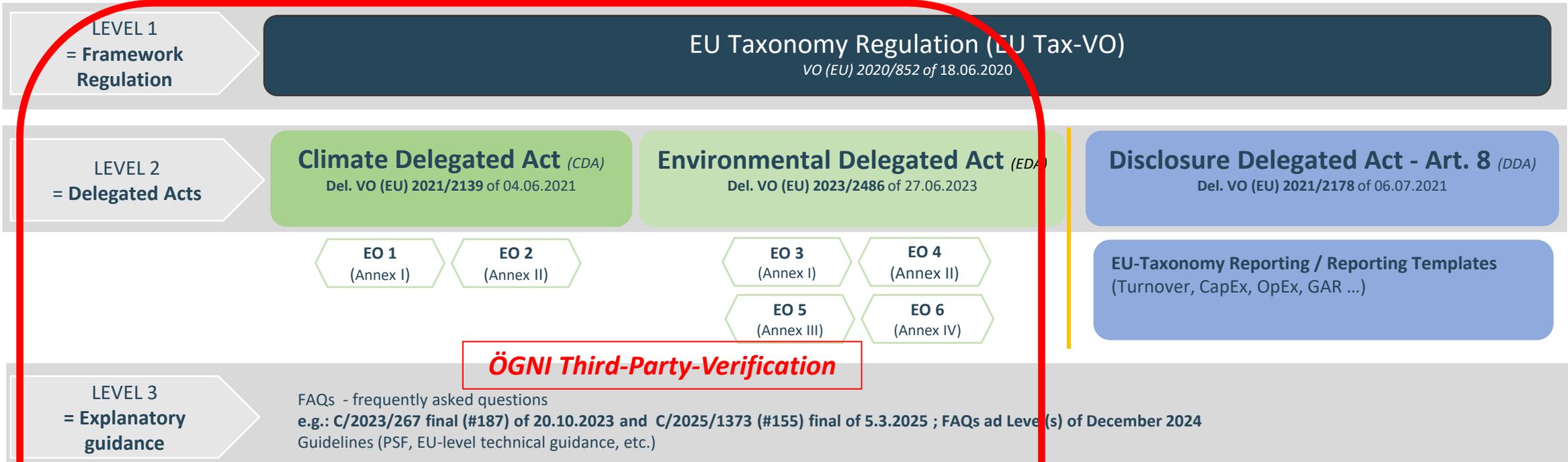
ÖGNI – Austrian Sustainable Building Council

Tel: +43 664 38 27 987

petra.kuehnel@ogni.at

- Responsible for **EU Taxonomy verifications** and the related **ESG regulatory framework**, acting as the key point of contact for technical and legal matters.
- Over 30 years of experience in the real estate industry across Austria and Germany. Prior to my current position, I worked as **Senior Asset Manager**, where I was responsible for the asset management of a broad range of property types, including residential, office and retail properties, retail parks, shopping centres, and hotel assets.

EU Taxonomy – Legal Acts by today – classification (TSC, MSS) vs. Reporting (Art.8)



6 Environmental Goals - Art 9 & 4 CRITERIA - Art. 3

"Economic activity" Level	Criteria	Details
SC - substantial contribution	Criteria 1	contributes substantially to one or more of the environmental objectives EO 1 climate change mitigation EO 2 climate change adaptation EO 3 sustainable use and protection of water and marine resources EO 4 transition to a circular economy EO 5 pollution prevention and control EO 6 protection and restoration of biodiversity and ecosystems
DN SH	Criteria 2	does not significantly harm any of the environmental objectives
TSC	Criteria 3	complies with the technical screening criteria
"Entity" Level	Criteria	Details
MSS	Criteria 4	"Minimum safeguards" - Art 18 <ul style="list-style-type: none"> OECD Guidelines for Multinational Enterprises UN Guiding Principles on Business and Human Rights ILO on Fundamental Principles and Rights at Work International Bill of Human Rights

EU-Taxonomy Reporting („EU-Tax-KPIs“)

Del. VO (EU) 2023/2486 – Änderung der Del. VO (EU) 2021/2178

• **Umsatz** (Turnover)
 • **CapEx** (Capital Expenditures – Investitionsausgaben)
 • **OpEx** (operating Expenses – Betriebsausgaben
 für Finanzunternehmen weitere KPIs, wie z.B. **GAR** (Green Asset Ratio)

EU Taxonomy – Legal Acts by today – amendments & supplements / in progress

DYNAMIC FRAMEWORK

LEVEL 1 = Framework Regulation

EU Taxonomy Regulation (EU Tax-VO)
VO (EU) 2020/852 of 18.06.2020

LEVEL 2 = Delegated Acts

Climate Delegated Act (CDA)
Del. VO (EU) 2021/2139 of 04.06.2021

EO 1
(Annex I)

EO 2
(Annex II)

Environmental Delegated Act (EDA)
Del. VO (EU) 2023/2486 of 27.06.2023

EO 3
(Annex I)

EO 4
(Annex II)

EO 5
(Annex III)

EO 6
(Annex IV)

Disclosure Delegated Act - Art. 8 (DDA)
Del. VO (EU) 2021/2178 of 06.07.2021

EU Taxonomy Reporting / Reporting Templates
(Turnover, CapEx, OpEx, GAR ...)

Amending / supplementing

Three update cycles since implementation

- Del. VO (EU) **2022/1214** of 09.03.2022: **new economic activities** – nuclear (section 4.26 – 4.31)
- Del. VO (EU) **2023/2485** of 27.06.2023 – EO 5 (m3/test chamber), Amendments Appendix B and C plus new economic activities (section 3, 6, 5, 8, 9 and 14)
- **Del. VO (EU) 2026/73** of 4.7.2025 – part of Omnibus (**published** in EUs official journal on **8.01.2026**) Amendments of Appendix C

- Del. VO (EU) 2023/2486 – amendments reporting templates

- **Del. VO (EU) 2026/73** of 4.7.2025 – part of Omnibus (Amendments reporting templates, 10% material threshold for EU Tax KP Reporting / Definition GAR new)

in progress

- **PSF FINAL Report of 01.04.2025** (397 pages_en) platform on sustainable finance – expert group in terms of EU Tax **versus** EFRAG = CSRD Expert group

EU Taxonomy Regulation – taxonomy-eligible – sections & economic activities

CONSTRUCTION and REAL ESTATE ACTIVITIES		Annex I CDA (2021/2139)	Annex II CDA (2021/2139)	Annex I EDA (2023/2486)	Annex II EDA (2023/2486)	Annex III EDA (2023/2486)	Annex IV EDA (2023/2486)
substantial contribution to environmental objective ("EO")		EO 1	EO 2	EO 3	EO 4	EO 5	EO 6
Section	taxonomy eligible sections	climate change mitigation	climate change adaptation	sustainable use and protection of water and marine resources	transition to a circular economy	pollution prevention and control	protection and restoration of biodiversity and ecosystem
1	Forestry	• (4)	• (4)				
2	Environmental protection and restoration	• (1)	• (1)				1. • (1)
3	Manufacturing	• (21)	• (17)	1. • (1)	1. • (2)	1. • (2)	
4	Energy	• (25)	• (25)				
5	Water supply, sewerage, waste management and remediation	• (12)	• (13)	2. • (3)	2. • (7)	2. • (4)	
6	Transport	• (20)	• (17)				
7	CONSTRUCTION and REAL ESTATE ACTIVITIES	• (7)	• (7)		3. • (5)		
8	Information and communication	• (2)	• (4)	4. • (1)	4. • (1)		
9	Professional, scientific and technical activities	• (3)	• (3)				
10	Financial and insurance activities		• (2)				
11	Education		• (1)				
12	Human health and social work activities		• (1)				
13	Arts, entertainment and recreation		• (3)				
14	Disaster Risk Management - Del.VO 2023/2485 (NEW)		• (2)	3. • (1)			
15	Services - Del.VO 2023/2486 (NEW)				5. • (6)		
16	Accommodation activities - Del.VO 2023/2486 (NEW)						2. • (1)
Sections TOTAL		9	14	4	5	2	2
Economy activities TOTAL		101	106	6	21	6	2
		207.00 economy activities		35.00 economy activities			

7 Construction and real estate activities
7.1. Construction of new buildings
7.2. Renovation of existing buildings
7.3. Installation, maintenance and repair of energy efficiency equipment
7.4. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)
7.5. Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings
7.6. Installation, maintenance and repair of renewable energy technologies
7.7. Acquisition and ownership of buildings

ÖGNI
Third-Party-Verification

3 Construction and real estate activities
3.1. Construction of new buildings
3.2. Renovation of existing buildings
3.3. Demolition and wrecking of buildings and other structures
3.4. Maintenance of roads and motorways
3.5. Use of concrete in civil engineering

EU Taxonomy Verification – ÖGNI „Third Party Verification“ (Austria)

Minimum Safeguards Art. 18



No longer included in ÖGNI EU Taxonomy Verification (since 14 July 2024)
as the requirement applies to entity level rather than activity level.
Must be **assessed separately** by the client

EO 1 – climate mitigation	
SC	DNSH
EO 2 – Adaption	
SC	DNSH
EO 3 – Water & Marine	
SC	DNSH
EO 4 – circular economy	
SC	DNSH
EO 5 – Pollution	
SC	DNSH
EO 6 – Biodiversity	
SC	DNSH

ÖGNI **only verifies compliance with TSC** at the economic activity level in accordance with Art. 3 (d) of the taxonomy regulation for :

- New construction - NEW**
7.1 / 3.1
- Renovation - REN**
7.2 / 3.2
- Acquisition & Ownership- AO**
7.7

14.12.2024 - Practical Guidance on TSC

31.01.2025 – Practical Guidance on MSS

<https://www.ogni.at/zertifizierung-verifikation/eu-taxonomie-verifikation>

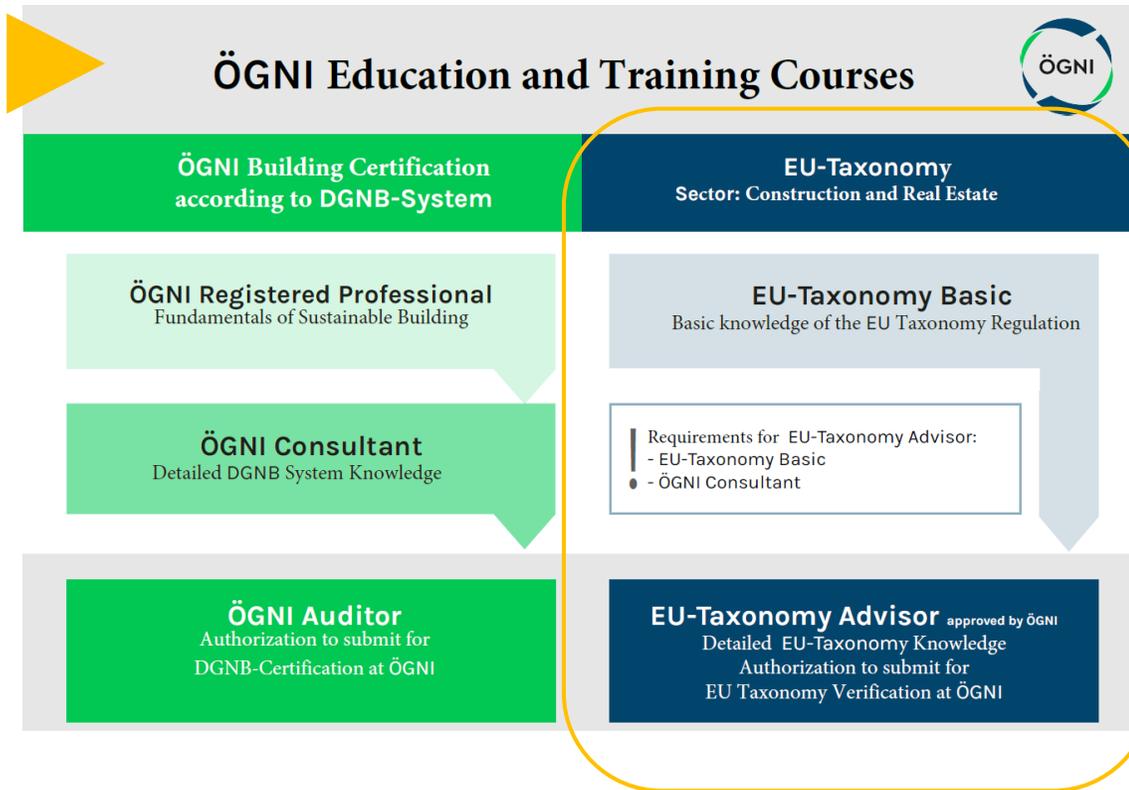
EU Taxonomy Verification – ÖGNI Statistics

Registration for EU Taxonomy Verification				
Year	Total	New Construction	Renovation	Acquisition and Ownership
2022	18	2	1	15
2023	30	4		26
2024	52	8	2	42
2025	46	14	4	28
Total	146	28	7	111

Status of Verification						
Year	cancelled	taxonomy-aligned	not taxonomy-aligned	partially aligned	pending	Total
2022	-	18	-	-	-	18
2023	-	24	5	-	1	30
2024	1	44	3	2	2	52
2025	-	36	2	1	7	46
Total	1	122	10	3	10	146

Registration for EU Taxonomy Verification + DGNB Certification					
Year	Total Taxo	Total Taxo + Certification	New Construction	Renovation	Acquisition and Ownership
2022	18	10	2	1	7
2023	30	11	4	-	7
2024	52	20	5	2	13
2025	46	21	3	4	14
Total Taxo + Certification	146	62	14	7	41
Total Taxo	-	146	28	7	111

Note: EU-Taxonomy Verification and ÖGNI certification require **separate** submission and independent assessment **but there is no additional fee** for EU Taxonomy Verification when submitted at the same time!



EU-Taxonomy BASIC – basic knowledge

- **Background & sector relevance:** Why the Real Estate Sector has a significant impact and must be part of the solution
- **EU Taxonomy framework:** entity level vs. economic activity level vs. reporting
- **Regulatory demarcation and contextual overview:** CSRD / SFDR / Art. 8 EU Taxonomy and EPBD
- **Structure and classification logic** of the EU Taxonomy
- Taxonomy **eligibility vs. alignment & short overview TSC and MSS**

EU-Taxonomy ADVISOR – advanced knowledge for EU Taxonomy Verification submission at ÖGNI

- **In-depth application of TSC** for the construction and real estate sector – covering all six environmental objectives
- Documentation requirements and verification approach for **EU Taxonomy alignment at ÖGNI**
- **EU Taxonomy verification process at ÖGNI & overview of relevant ÖGNI documents for submission etc.**

EU Taxonomy Verification – Advisory Boards & GBC-Exchange (EU & Int.)

ADVISORY BOARDS Regular Meetings

TECHNICAL BOARD – Monthly meetings

- Discussion of practical application questions and interpretation of the EU Taxonomy
- Sector-specific implementation challenges in construction and real estate
- Representatives from leading market players
(ATP sustain, HABAU, BIG, PORR, Drees & Sommer, Pfeiler, Labugger, Oterea and Raiffeisen)

STRATEGIC BOARD – Quarterly meetings

- Market listening platform on practical implementation (EU Taxonomy, CSRD, SFDR)
- Identifies key challenges and emerging needs across entire real estate value chain
- Ensures ÖGNI remains closely aligned with market realities
- Representatives from across the entire value chain
(Asset Manager, Technical Experts, Developers, Banks, Investors, Acquisition and Sales)

International & EU – Collaboration, Exchange and Knowledge Transfer

DGNB DGNB-
Cooperation &
GBC Interaction
EU Taxonomy
1x/month



Climate Positive Europe Alliance –
Think Tank based in Brussels

- ÖGNI is founding member
- Exchange of knowledge, ideas, and solutions between EU policy makers and practitioners
- Issuing recommendations for action
- **Development/rollout of taxonomy verification partnership + incubator for other GBCs (Green Building Councils) in Europe – start in 2026**



- ÖGNI is the only established member from Austria and, as the Austrian Sustainable Building Council, represents Austrian knowledge and interests at international and European level.
- ÖGNI holds the vice chair position of the European Regional Network (Richard Teichmann)
- Monthly working group meetings e.g. on sustainable finance, including knowledge transfer + exchange on the EU Taxonomy



EU Taxonomy Verification – issued by ÖGNI

EU TAXONOMY VERIFICATION

PROJECT INFORMATION:

Property Name: Substantial Contribution to Environmental
 Project Number: Objective: Climate Change Mitigation
 Address: Applicant:
 Asset Class: Residential Building EU Taxonomy Advisor
 Taxonomy Category: New Construction approved by ÖGNI

TAXONOMY VERIFICATION RESULT

At the time of verification, the project meets the technical assessment criteria of the EU Taxonomy Regulation (EU) 2020/852.
 In accordance with: ÖGNI/EU-Tax Verification NEUBAU_Nachweisdokumentation Version 2025_20250812

EU Taxonomy Verification in accordance with the EU Taxonomy Regulation (EU) 2020/852 refers to the assessment of the compliance of economic activities with the technical assessment criteria applicable on the respective reference date. For financial flows that are disclosed or reviewed on a regular basis (e.g. annually), this EU taxonomy verification can also be used beyond the original reporting date as proof of taxonomy compliance for the respective reporting year, provided that the underlying activities and framework conditions have not changed significantly. This approach is in line with the European Commission's comments in the FAQs of 5 March 2025 (Final EU (C)_2025_1373_355 Fragen_en, questions 7 to 9)

ISSUER

Address: ÖGNI GmbH, Mayerhofgasse 1/22
 A- 1040 Vienna
 Date: 17 February 2026

Peter Engert
 Mag. Peter Engert, Managing Director of ÖGNI



EU Taxonomy Verification by ÖGNI



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EU TAXONOMY VERIFICATION

Detailed Results

EU TAXONOMY REQUIREMENTS FOR NEW CONSTRUCTION	COMPLIANCE
Minimum Safeguards	not examined*
Substantial Contribution: E01 Climate Change Mitigation	
Existence of an energy performance certificate	●
PED _{EU,ref,ann} falls below the national threshold by at least 10%	●
<small>Note: $W_{PED,ref,ann} = 2864 \text{ kWh/m}^2 \cdot \text{a}$, $t_{ref,ann} = 0.763$ $W_{PED,ref,ann} = 2658 \text{ kWh/m}^2 \cdot \text{a}$, $t_{ref,ann} = 0.822$</small>	●
Blower Door Test (if $GFA_{aboveground} > 5.000 \text{ m}^2$)	●●
Thermography Measurement (if $GFA_{aboveground} > 5.000 \text{ m}^2$)	●●
GWP Calculation (if $GFA > 5.000 \text{ m}^2$)	●●
DNSH: E02 Climate Change Adaption	●
DNSH: E03 Sustainable Use and Protection of Water and Marine Resources	●
DNSH: E04 Transition to a Circular Economy	●
DNSH: E05 Pollution Prevention and Control	●
DNSH: E06 Protection and Restoration of Biodiversity and Ecosystems	●

Legend
 ● BC Requirements met | ● DNSH Requirements met
 ● Requirements not met | ● Requirements not relevant

*Note on Minimum Safeguards:
 ÖGNI does not verify compliance with the minimum safeguards pursuant to Article 18 of the EU Taxonomy Regulation – (EU) 852/2020 of 18 June 2020. This decision is based on the recognition that the verification of these minimum safeguard measures at company level requires specialist knowledge that is usually available from other professional groups (e.g. management consultants and/or auditors and/or lawyers). Upon request, we are happy to put you in touch with experienced companies that can assist you in this regard. However, ÖGNI is not responsible for the selection of a suitable company, nor for the verification of the minimum safeguards by this company.
 ÖGNI only verifies compliance with certain technical assessment criteria at the level of economic activity in accordance with Article 3(d) of the EU Taxonomy Regulation.
 Verification of compliance with the minimum safeguards pursuant to Art. 18 must be provided separately by the client. The recipient of this verification is advised that full taxonomy compliance also requires compliance with the minimum safeguards.

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MSS – „not examined“

*Note on Minimum Safeguards:
ÖGNI does not verify compliance with the minimum safeguards pursuant to Article 18 of the EU Taxonomy Regulation – (EU) 852/2020 of 18 June 2020. This decision is based on the recognition that the verification of these minimum safeguard measures at company level requires specialist knowledge that is usually available from other professional groups (e.g. management consultants and/or auditors and/or lawyers). Upon request, we are happy to put you in touch with experienced companies that can assist you in this regard. However, ÖGNI is not responsible for the selection of a suitable company, nor for the verification of the minimum safeguards by this company.
ÖGNI only verifies compliance with certain technical assessment criteria at the level of economic activity in accordance with Article 3(d) of the EU Taxonomy Regulation.
 Verification of compliance with the minimum safeguards pursuant to Art. 18 must be provided separately by the client. The recipient of this verification is advised that full taxonomy compliance also requires compliance with the minimum safeguards.

„frequency“ / „valid date“

EU Taxonomy Verification in accordance with the EU Taxonomy Regulation (EU) 2020/852 refers to the assessment of the compliance of economic activities with the technical screening criteria applicable **on the respective reference date**. For financial flows that are disclosed or reviewed on a regular basis (e.g. annually), this EU taxonomy verification can re-use valid documentary evidence. A new third party verification should only take place whenever there are **material changes** to the information that is subject to verification. This approach is in line with the European Commission's comments in the FAQs of 5 March 2025 (Final EU (C)_2025_1373_#155 questions_en, questions 7 to 9)

EU Taxonomy Verification – „partially aligned“ (since April 2025)

- **NOT (!) for acquisition and ownership (AO)**
- **EU Taxonomy remains a binary framework (yes/no)**
- **documents the result of the compliance assesment**



TAXONOMY VERIFICATION RESULT

At the time of assessment, the project partially meets the technical assessment criteria of the EU Taxonomy Regulation (EU) 2020/852.

In accordance with: ÖGNI_EU-Tax Verifikation NEUBAU_Nachweisdokumentation Version 2025_20250812

This verification does not constitute confirmation of full EU taxonomy compliance. The EU taxonomy is a binary system – compliance is only achieved if all technical assessment criteria are met in full for all relevant environmental objectives. This verification documents the result of the assessment by ÖGNI. It clearly shows which requirements have already been met – and which have not. The aim is to make the degree of implementation visible and, in particular, to provide banks and investors with a sound basis for decision-making.

Green mark: full compliance / Orange mark: partial compliance (at least one environmental objective not met)

EU TAXONOMY VERIFICATION Detailed Results

EU TAXONOMY REQUIREMENTS FOR NEW CONSTRUCTION	COMPLIANCE
Minimum Safeguards	not examined*
Substantial Contribution: E01 Climate Change Mitigation	
Evidence of an energy performance certificate	
PEC _{actual} falls below the national threshold by at least 10%	●
Blower Door Test (P _{0,air} ≤ 0,500 w)	●
Thermography Measurement (P _{0,therm} ≤ 0,500 w)	●
GWP Calculation (GWP ≤ 0,500 w)	●
DNH: E02 Climate Change Adaptation	●
DNH: E03 Sustainable Use and Protection of Water and Marine Resources	●
DNH: E04 Transition to a Circular Economy	●
DNH: E05 Pollution Prevention and Control and Ecosystems	●
DNH: E06 Protection and Restoration of Biodiversity	●

Purpose & Market Impact

- Enhances transparency for banks & investors
- Supports risk analysis & decision-making
- Every assessed project receives a verification with the actual result
- Facilitates market access, especially for smaller actors

EU Taxonomy Verification – Re-Verification

EU TAXONOMY

NEWS ON THE EU TAXONOMY VERIFICATION

The EU taxonomy is a dynamic set of rules. Ongoing adjustments and regulatory clarifications mean that once an EU taxonomy verification has been carried out, it does not necessarily remain valid indefinitely. ÖGNI will start re-verifications for the EU taxonomy in 'Acquisition and Ownership' in autumn 2025 – pilot phase.

The final EU Commission FAQs (C/2025/1373) dated 5 March 2025 address key issues:

- **Who is authorised to conduct audits?**
Requirements for independent third-party verification
- **How often must audits be repeated?**
Frequency of renewed EU taxonomy verification
- **How long is existing evidence valid?**
Reusability of existing EU taxonomy verification evidence in subsequent years

Basic principle:

As long as there are **no significant changes** to the original EU taxonomy verification, existing evidence and the original verification status can also be used in **subsequent reporting years**. However, if there are **significant changes** to the basis for verification (e.g. technical requirements, data basis, risk assessment or regulatory requirements), a **renewed verification by an independent third party** is required.

In order to offer real estate companies a clear and practical solution for this dynamic process, ÖGNI will introduce a **re-verification** for projects in economic activity **7.7 'Acquisition and ownership' (AO) from autumn 2025**. This offer is aimed at projects that have already successfully completed an initial EU taxonomy verification with ÖGNI and now need or wish to update it based on new information and regulations.

The following criteria must also be met:

- **Same building:**
→ thermal building envelope unchanged
→ gross floor area unchanged
- **Same project – same applicant** The applicant must be identical to the initial verification.

Why re-verification?

Re-verification for AO (acquisition and ownership) ensures that an existing taxonomy compliance status continues to comply with **current regulatory, technical and risk-related developments**. Reasons for this may include:

- **Regulatory changes or clarifications** by the EU
- **Updated technical evidence** (e.g. new energy performance certificates, amended climate risk analyses)
- **Subsequent submissions as part of the dynamic review process** (e.g. additions to climate-related risks)

ÖGNI assesses on a **case-by-case basis** whether a project meets the requirements for re-verification or whether a complete re-verification is necessary. The decisive factors are the scope and relevance of the changes compared to the original assessment. The decision to submit, on the basis of which the review is carried out, remains with the applicant.

- **Only for A&O (acquisition and ownership)**
- Initial verification successfully completed with ÖGNI
- Same applicant
- Same building

Reasons for a re-verification:

- (a) Regulatory changes/clarifications
- (b) Substantive changes (new EPC, new CRA exposition models)
- (c) Addition of missing information due to dynamic developments in knowledge (e.g. requirements for a CRA, future projections by IPCC etc.)

The perfect Symbiosis – ÖGNI Certification and EU Taxonomy Verification

→ ÖGNI certification does NOT mean EU Taxonomy alignment

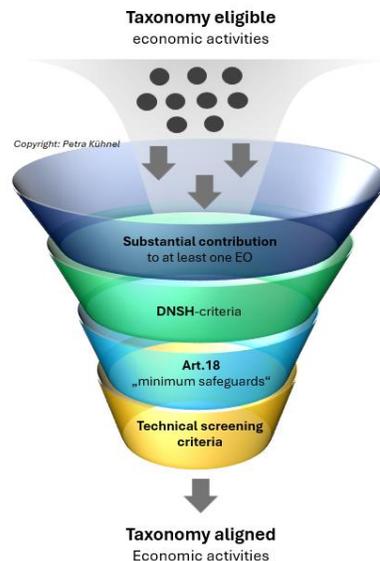
- EU Taxonomy alignment requires a **separate** verification process (**no additional fee** when submitted at the same time as verification)
- Based on **two different assessment systems and logics!**
- May lead to **additional points** for example under **“GIB” (building in use) certification**
- **A perfect symbiosis for sustainable building**

EU TAXONOMY:

- **Based on dynamic EU regulatory framework** with continuous updates (Delegated Acts, FAQs, Guidance Docs).
- Legally defined requirements
- No influence on criteria content
- No „version fixing“ or freezing possible
- **Binary assessment** logic (Yes / No) – alignment only if:

CERTIFICATION:

- **Based on voluntary certification system**
- Performance-based scoring system
- Criteria defined by DGNB/ÖGNI
- System variants and requirements can be fixed or reserved
- Awards levels based on overall performance (points)



4 award levels depending on overall fulfillment rate (points)

	Platin	Gold	Silber	Bronze+
overall fulfillment rate	ab 80%	ab 65%	ab 50%	ab 35%
minimum level of fulfillment	65%	50%	35%	-- %

* This award applies only to the existing building certificate or the "building in operation" certificate.

- Minimum fulfillment threshold in the main topic – excluding Building in USE (GIB)
- **Few minimum requirements for ALL or only PLATIN**



Thank you for your attention!

More Information: www.ogni.at

