EU DIRECTIVE 2023/1791 · ARTICLE 11

The EED energy audit deadline is closer than most facilities think.

What Article 11 actually requires, who's now in scope, and where audits fall apart before October 11, 2026.

Article 11: a recurring, mandatory energy audit — not a one-off form.

Directive (EU) 2023/1791 requires enterprises above a set energy consumption threshold to complete an independent energy audit, and to repeat it **at least every four years.**

The first cycle under the recast rules is due **11 October 2026.**

11.10.2026
first audit deadline

4 YRS
mandatory repeat cycle

The threshold moved from headcount to energy consumption.

Until the 2023 recast, the obligation only caught **"large enterprises"** — 250+ employees, or turnover above €50M.

That test is gone. Scope is now based purely on how much energy you use — not how many people work there.

> A facility with 30 people can be fully in scope. A facility with 300 can be exempt. Size stopped being the filter.

10 TJ isn't an abstract figure. It's one mid-sized plant.

Averaged over the last three years, all energy carriers combined:

AUDIT THRESHOLD

10 TJ

≈ 2,778 MWh / year

Roughly the annual load of a single mid-sized production site.

EMS THRESHOLD

85 TJ

≈ 23,611 MWh / year

Triggers a certified management system instead of a periodic audit.

An audit and a management system are not the same commitment.

10 TJ →	**Energy audit** due 11 Oct 2026. A snapshot, repeated every 4 years.
85 TJ →	**ISO 50001 EMS** due 11 Oct 2027. Continuous monitoring, not a periodic check.
EITHER WAY →	A certified EMS that covers enough of your consumption can exempt you from the separate audit.

It's not measured site by site. It's measured as one enterprise.

The threshold aggregates **every energy carrier** — electricity, gas, district heat, fuel — across **every site** the company operates.

> A group of facilities that each look "under the radar" individually can still cross the line once you add them up.

And if a line, department, or site isn't separately metered, its consumption doesn't disappear from the count — it gets **estimated into your total**, usually on the high side.

Three requirements do most of the damage to unprepared facilities.

COVERAGE	Must represent a substantial majority of total consumption — commonly ~80% under national rules. Auditing your three best lines and calling it done doesn't qualify.
MEASURED DATA	Annual invoices may satisfy the paperwork, but auditors need real load profiles to produce recommendations that actually hold up.
ACTION PLAN	After the audit, you must set out how you'll implement the recommendations — and publish it. It no longer goes in a drawer.

The real deadline isn't 2026. It's 2030.

Whatever action plan you publish in 2026 becomes the **baseline** you're measured against at the next audit cycle.

Without granular before-and-after consumption data, there's no way to prove a savings measure actually worked — and that gap won't show up until 2030.

Compliance readiness starts with data you already have — captured properly.

Our energy monitoring and submetering systems capture consumption at the **sub-panel, line, or machine level** — continuously, not once a year.

That data feeds a single energy management platform, so the numbers already exist before an auditor asks for them — and still exist for the 2030 comparison.

> No reconstructing a year of consumption from invoices. No estimated gaps between sites.

Is your facility's data actually ready for October 11?

If your consumption is anywhere near 10 TJ, the weeks ahead are worth more spent on visibility than on chasing invoices.

Comment below, or reach out directly if you want to see how our monitoring architecture maps onto EED audit requirements.

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