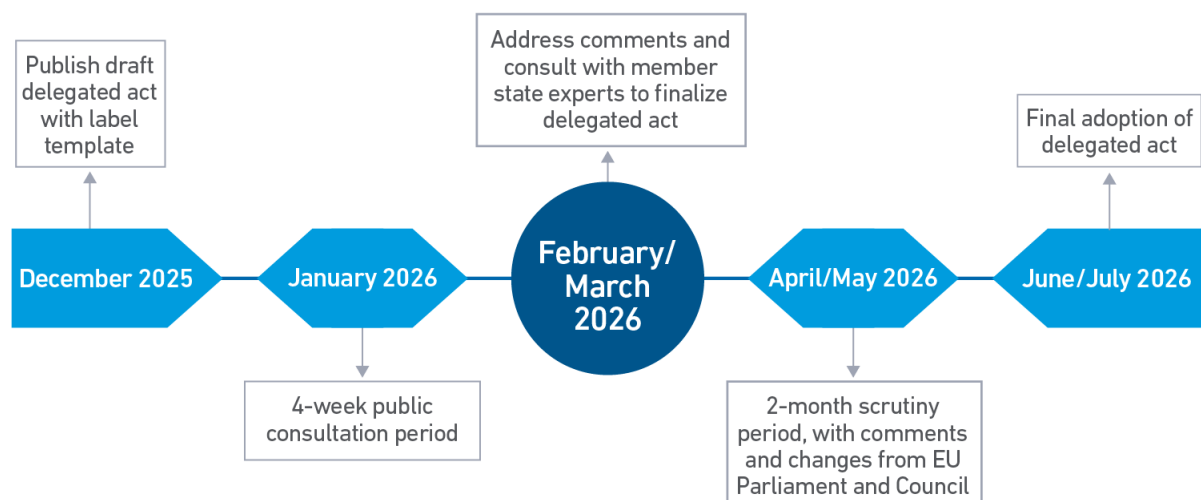# Final action on EED rating/label expected on June 10, 2026

Jay Dietrich   23 Jan 2026

The European Commission has clarified its schedule for amending the Energy Efficiency Directive (EED) information and key performance indicator (KPI) reporting requirements in the first delegated regulation (see *EED delegated regulation is finally final*) and for finalizing a labeling and rating scheme proposal for the second delegated regulation (see *EU label and performance value proposals move ahead*). The Commission has compressed its original schedule (see **Figure 1**).

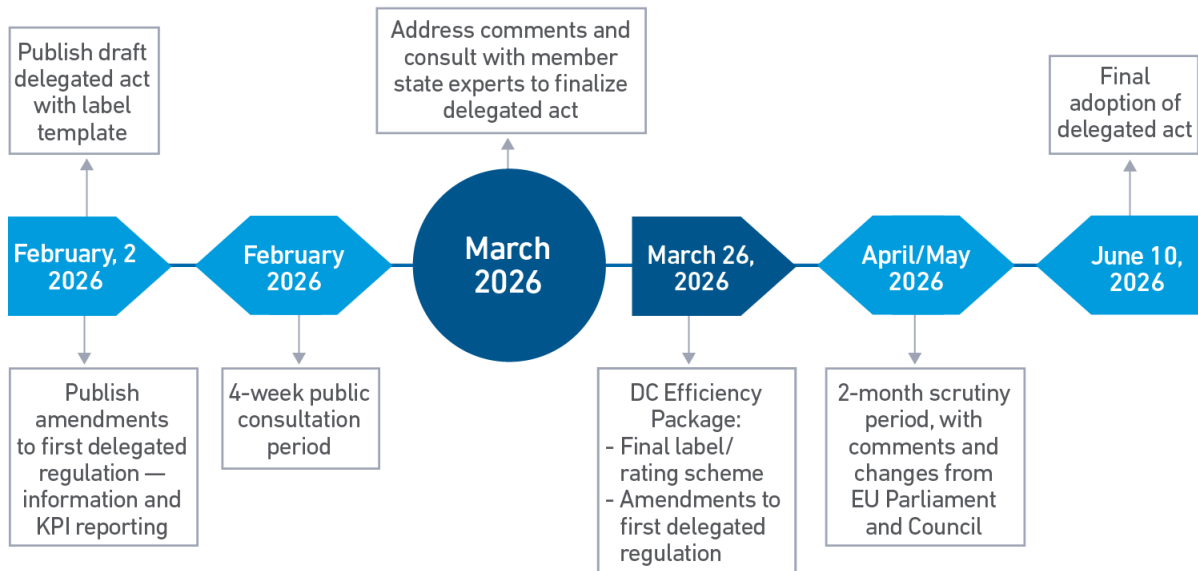Figure 1 November 2025 schedule to publish the second EED delegated regulation

The release of the draft amendments and labeling proposal has been delayed until February 2, 2026, followed by a four-week public consultation period in February. The final delegated regulations are projected to be published on June 10, 2026 (see **Figure 2**).

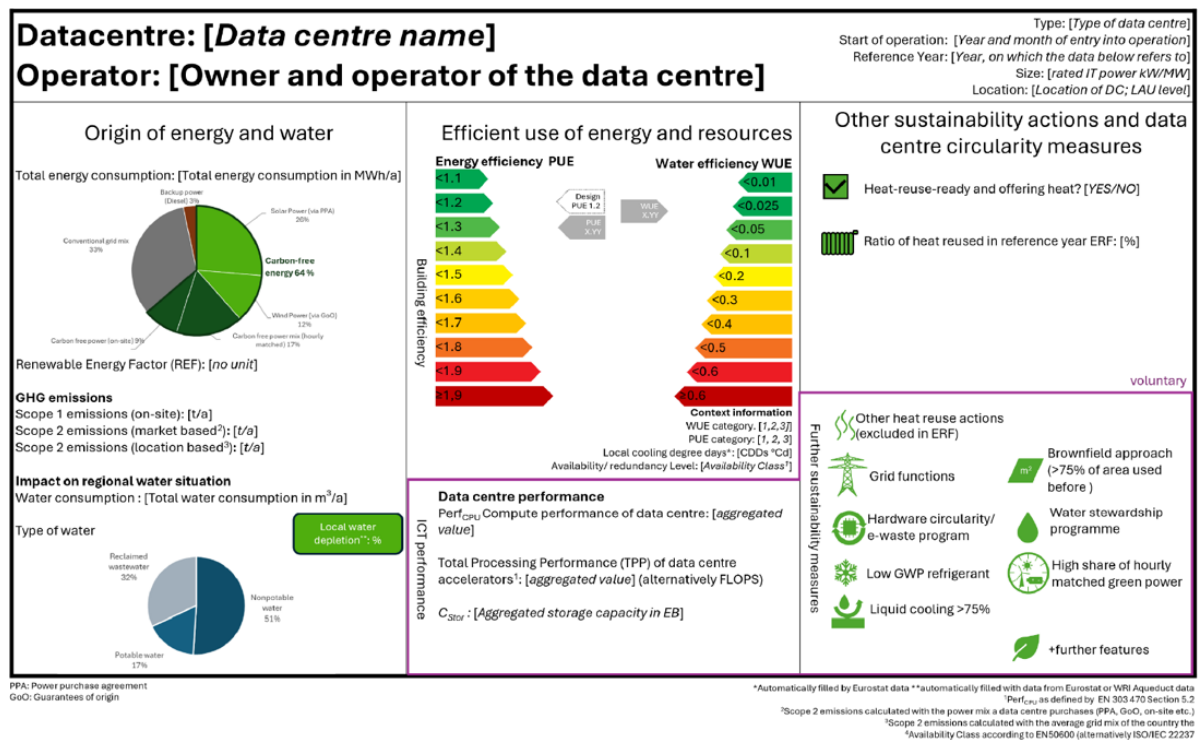Figure 2 Revised timeline to publish the second EED delegated regulation

Unsurprisingly, the publication of the draft amendments and regulations was delayed. The label proposed by the consultant in the second technical assessment report (see **Figure 3**) would require operators to report up to 20 KPIs that are not currently collected in the EU database on data centers. The Commission and EU member states have to complete significant work to determine whether expanding the KPIs reported on the label would improve the public's ability to assess a data center's sustainability and energy efficiency characteristics.

Figure 3 Proposed EU Data Centre label

The Commission intends to create the labels using data from the EU database — operators will not

generate them. Any additional label data and indicators would need to be identified through amendments to the first delegated regulation, and the EU database on data centres would need to be modified and expanded.

It would be easier to proceed with a simpler label based solely on the information and operational data required under the current delegated regulation, as changes to the database and data collection processes would take significant time. Major changes would delay label publication until 2027 or 2028. Regardless, some modification of the database will be required to generate the labels.

The regulation amendments and the proposed label and rating must also address the data confidentiality issues that currently hinder the EED data collection process. Many operators have not reported all or part of the required data because they classify the information as business confidential (see *Incomplete data threatens the effectiveness of the EED*). The Commission must clarify the definition of business-confidential KPIs and the process for managing them. It would be unfair to subject those operators who fully report their data to public scrutiny through the labeling process while others remain exempt due to lacking or withholding data on the grounds of confidentiality.

Uptime Intelligence advises operators with European data centers to closely examine the amendments and label scheme proposals when they are published in February and to submit comments during the public consultation period. Further Uptime Intelligence reporting will follow promptly upon publication of the Commission's proposals, and a set of comments will be submitted on behalf of Uptime Network members.

The Commission's changes to information and KPI reporting requirements, the finalization of the label template, and the publication of the rating label for each operating data center will increase public scrutiny of data center operations in Europe. The label information will highlight differences in data center operations driven by factors such as different cooling systems, varying levels of operational discipline, and differing IT infrastructure efficiency. Operators will need to assess how the label portrays their operations and consider what actions may be necessary to explain their data and demonstrate ongoing efforts to optimize operational efficiency.

Note: The regulatory analysis provided in this Update is the opinion of Uptime Intelligence. Data center operators should validate the interpretations with their legal staff and any relevant regulatory authorities.

ABOUT THE AUTHOR

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Jay is the Research Director of Sustainability at Uptime Institute. Dietrich looks beyond the hype to analyze the transformations required in energy and IT systems, data centers and software management systems, and intra-organizational collaboration, both within and between companies, to deliver sustainable data center operations.

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About Uptime Institute

Uptime Institute is the Global Digital Infrastructure Authority. Its Tier Standard is the IT industry's most trusted and adopted global standard for the proper design, construction, and operation of data centers – the backbone of the digital economy. For over 25 years, the company has served as the standard for data center reliability, sustainability, and efficiency, providing customers assurance that their digital infrastructure can perform at a level that is consistent with their business needs across a wide array of operating conditions.

With its data center Tier Standard & Certifications, Management & Operations reviews, broad range of related risk and performance assessments, and accredited educational curriculum completed by over 10,000 data center professionals, Uptime Institute has helped thousands of companies, in over 100 countries to optimize critical IT assets while managing costs, resources, and efficiency.