

ESOS Phase 4

Compliance to Cost Savings

Qualify by December 2026. Notify by December 2027.

What is ESOS Phase 4?

ESOS is the UK's mandatory energy assessment scheme for large undertakings, administered by the Environment Agency in four-year phases. Phase 4 runs from 6 December 2023 to 5 December 2027 and requires organisations to measure total energy consumption across buildings, transport and industrial processes, audit a representative sample of sites, and notify compliance.

Phase 4 raises the bar. Display Energy Certificates and Green Deal Assessments are no longer accepted compliance routes, at least 95% of total energy consumption must be covered by the assessment, and participants must report progress against previous action plan commitments, explaining publicly where those commitments have not been met.

[Learn more about ESOS Phase 4 →](#)

Who qualifies

- Organisations with 250 or more UK employees, or turnover above £44m combined with a balance sheet total above £38m.
- One in, all in: if one UK group entity qualifies, the group is in scope.

Qualification date - 31 December 2026

- Confirm scope now and select a compliant continuous 12-month energy data reference period before the window closes.

Compliance deadline - 5 December 2027

- Lead assessor signed audits covering 95% of energy use, board level sign-off, and Notification of Compliance submitted to the Environment Agency.

Action plan and annual updates

- A board approved action plan plus annual progress updates each December, published openly. Penalties reach £50,000 plus daily fines and naming on the public register.

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Our experience

20+ ESOS Notification of Compliance submissions, across many different industries, only in Phase 3.

Savings achieved by our recommendations

Up to 10%

from implementing Behavioural Change actions

Up to 15%

from reviewing and updating Operational and Control Settings

Up to 15%

from implementing Equipment and Machinery upgrades

Up to 50%

by electrifying their fleet

Trio's solution

- ESOS Phase 4 requirements are specific, and Trio's expertise ensures every mandatory obligation is met in line with Environment Agency guidance - avoiding penalties and public naming on the non-compliance register.
- We run the full cycle: qualification assessment, data collection and reference period selection, site audits, lead assessor sign-off, notification, and a board-ready action plan your organisation can realistically deliver.
- We then help you track and evidence progress against those commitments, so your annual December updates demonstrate real savings rather than explanations for why targets were missed.

Next steps

Phase 4 qualification closes on 31 December 2026 and notification is due by 5 December 2027. We are running open office hours on ESOS Phase 4 - connect with Trio to talk through your qualification, data reference period and audit plan.

Contact us →