



A **Decarbonised** Europe

A Thriving Industry

The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning, and heat pump industry (RACHP) in Europe. With over 50 member companies, national and international associations in 22 countries, we represent over 200,000 direct jobs and millions of indirect jobs across Europe. Our members have 100+ manufacturing sites and R&D facilities across the EU.

The policy priorities outlined in this manifesto will support the EU in achieving its environmental and sustainability leadership objectives, while fostering resilience and competitiveness that will allow our vibrant industry to continue to innovate.



OUR POLICY PRIORITIES

1. Recognizing the critical role of RACHP technologies in energy efficiency and climate mitigation.

RACHP equipment and systems operate throughout society, in homes and office buildings, as well as in commercial and industrial sites. In addition to health, food preservation and other social benefits, our solutions can help to increase the amount of renewable electricity in the power grid by providing higher demand flexibility and energy storage. Heat pumps support district heating and cooling networks, thermal storage, as well as recovery of waste heat and cold.

We call on the EU Institutions and Member States to recognize the immense role our industry plays in driving energy efficiency, reducing the use of fossil fuels, and supporting climate mitigation in pursuit of the 90% greenhouse gas reduction goal.

2. Implementing the energy efficiency first principle.

For the first time in EU legislation, the energy efficiency first principle is legally defined, with energy efficiency measures now a guiding principle in all policies.¹

Energy efficiency and energy savings must be at the centre of EU policy.

3. Harnessing the sustainability, safety, and affordability of our products.

Sustainable heating and cooling requires safe, affordable, and climate friendly products. With an average lifespan of over 20 years, and recent





estimates showing household savings of up to €900 per year, heat pumps are a well-known, proven, and safe solution that provide renewable and energy-efficient heating, cooling, and domestic hot water for residential, commercial, and industrial applications.² Moreover, the industry is a key supporter of implementing the circular economy principles for refrigerants, and believes in fostering the Recovery, Recycling and Reclamation (RRR) of refrigerants through appropriate policies.

Our industry supports the green transition, and we look forward to the Commission pressing ahead with its planned Heat Pump Action Plan and supporting Member States in incentivizing the decarbonization of heating.

4. Achieving the 2050 decarbonization target.

Sustainable heating and cooling technologies are essential to achieving the 2050 decarbonization targets. Sustainable cooling technologies play a pivotal role in combating climate change, as articulated in the [Cooling Pledge at COP28](#). Transformative measures that prioritize sustainable cooling solutions are becoming increasingly necessary to achieve climate goals.

Embracing innovation and fostering a commitment to sustainable heating and cooling technologies and practices are essential components to a climate-resilient future. We look forward to collaborating on the implementation of the recently agreed F-gas regulation.

5. Addressing the future of industry competitiveness and the single market.

Our industry develops some of Europe's key technologies, enabling a sustainable transition. As the EU faces the digital transformation, the

¹ Article 3, DIRECTIVE (EU) 2023/1791 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955 (recast) (JO L 231/1 of 20.09.2023).

² IEA, Home heating technologies, [Latest findings](#), Last update: 11 July 2023,

transition should be independent, secure, and resilient, capitalizing on the immense potential that smart building systems and connected RACHP equipment offer. A competitive European Union is our priority.

We look forward to a holistic approach involving all industry actors in strengthening the electricity grid's resilience, e.g. Ecodesign and interconnectivity standards.

6. Implementing Green Deal files at the national level & completing the Green Deal at the EU level.

Uniform implementation and effective enforcement by national authorities is critical to achieving real energy savings with innovative technology developed by our industry. Without effective implementation, including for employment and exports, we will fail in achieving actual decarbonization and a drastic abatement of fossil fuel emissions, including the REPowerEU objectives.

We call for stable and long-term incentive programmes to foster consumer confidence when investing in building renovation and decarbonization technologies like heat pumps, such as those that were established at Member State level under the transposition of the Energy Efficiency Directive and Energy Performance of Buildings Directive.

7. Allowing for transparent and scientifically-based policymaking.

Industry perspectives offer decades of expertise and are essential to the technical and economical backing of the policymaking process. Scientific and technical knowledge is key to ensuring balanced, efficient, and pragmatic legislation that will benefit the economy, society, and the environment.

The EU's decision-making process should ensure and increase transparency during all the steps of its process, for example on PFAS and their safe use in products, or by sharing impact assessments in a timely manner. The challenges with overlapping policies — like the F-gas regulation, Ecodesign, and potentially PFAS restrictions under ECHA — must be addressed to ensure certainty for industry innovation and investments.

EPEE is committed to supporting the EU through its energy transition and looks forward to working closely with policymakers to ensure we achieve our shared ambition.

