

EPEE feedback on the Commission roadmap for a European Climate Law

The European Partnership for Energy and the Environment (EPEE), the voice of the cooling and heat pump industry in Europe, welcomes the initiative to establish a legally binding 2050 climate-neutrality objective with the following priorities:

- **Implement & enforce the Clean Energy Package**, in particular the EED and the EPBD. Closing the energy efficiency investment gap will result in millions more skilled jobs across the EU.
- **Consolidate national heating & cooling plans** as part of the NECPs, mandating an integrated approach of heating & cooling.
- **Strengthen market surveillance**, particularly for F-gas and Ecodesign measures, building on the opportunities offered by the Market Surveillance Regulation and encouraging Member States and market surveillance authorities to improve cooperation and information exchange.
- **Increase climate targets in a coherent manner**, ensuring that targets for GHG reduction, energy efficiency and renewables are mutually supportive. If the 2030 GHG reduction target is raised, the Commission should equally re-evaluate the 2030 energy efficiency and renewable energy targets, taking into account the full cost-effective potential and multiple benefits of energy efficiency and making it a binding target as is the case for GHG and renewables.
- **Trigger sustainable investments** by establishing a framework that encourages the optimum balance of investment for efficiency improvements in the demand side and power infrastructure in the supply side. This can only be achieved by enabling capital markets to identify and respond to investment opportunities that contribute to environmental policy objectives, by ensuring sustainable public spending (taxation, electricity prices, subsidies) and putting an end to fossil fuel subsidies.

For EPEE, the Climate Law is an opportunity to promote an integrated heating & cooling approach, which would maximize the benefits of cooling whilst creating the smallest footprint in terms of GHG emissions and electrical peak demand. Cooling is a crucial contributor to societal benefits such as the supply of fresh food and medicine via a safe and uninterrupted cold chain, productivity and thermal comfort in view of warming temperatures, increasing urbanization and an ageing population. Therefore, sustainable cooling should be included in all funding schemes and programs presented under the Climate Law, particularly in view of new policy initiatives in the context of the European Green Deal such as the “renovation wave”, “smart sector integration” and the “farm to fork strategy”.

For example, in building renovation, cooling is mostly not properly considered which is a missed opportunity given its potential to contribute to the decarbonization of heating via electrification and heat pumps which can provide both, heating and cooling, while providing flexibility to the grid. In the same vein, cooling can be an enabler for a more sustainable food system by contributing to innovative ways of animal breeding (e.g. fish) and vegetable cultivation.

Concerning the development of data and instruments to achieve climate neutrality, EPEE has developed a comprehensive model to assess pathways in view of the EU F-Gas Regulation and, in cooperation with UN Environment, to support developing countries in achieving the Kigali Amendment to the Montreal Protocol. In parallel, EPEE’s model is being extended to include the energy consumption of cooling. The modelling can support the Commission’s work in understanding the split between refrigerant related emissions (e.g. due to accidental leaks) and energy related emissions as well as the impact of cooling on peak electricity demand. It will also help illustrate the importance of the transition to renewable energies and the role Europe can play as a technology leader in this field.