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**Nordenergi calls for an updated heating and cooling strategy with heat pump action plan**

- The large potential of decarbonisation in the heating and cooling sector requires increased focus in the upcoming 2040 climate target legislation.
- There is a need for an updated EU heating and cooling strategy.
- Heat pumps, both large-scale and individual heat pumps, represent a major contributor to decarbonisation; thus, the Heat Pump Action plan should be launched and made an integral part of the heating and cooling strategy.
- The Heat Pump Action plan must not distort already established and well-functioning heating markets.

Nordenergi supports the Commission's proposal for an ambitious 2040 climate target of 90 % emission reductions. We acknowledge the Communication and its thorough Impact Assessment. However, we are concerned that not enough focus is set on releasing the potential for decarbonisation of the heating and cooling sector. The EU building stock accounts for 42 % of the final energy consumption and more than 35 % of the energy related greenhouse gas emissions. Heating and cooling needs sums to 80 % of the energy consumption in buildings, making this a very important sector for emission reductions.

There is a large potential for decarbonisation of the district heating systems, as the Nordic countries have demonstrated, converting from fossil heat to the use of waste heat from industry and businesses, utilising heat resources that otherwise would be lost. The EU legislation must support ramp up and long-term usability of renewable energy in district heating including solar thermal power, bioenergy, large-scale heat pumps, electric boilers, and heat from waste incineration. District heating also provides energy storage of increased importance and value through the large thermal storages connected to the district heating systems.

We fully agree with the Commission that electrification will serve as a major catalyst for emissions reductions. In the heating and cooling sector this will include a massive roll-out of heat pumps using renewable energy in the building stock, in particular in rural areas outside district heating areas, large-scale heat pumps for industrial heating and cooling and large-scale heat pumps in the district heating networks. We therefore call for the Commission to publish the announced Heat Pump Action Plan and make this an integral part of the revision of the heating and cooling strategy. Particularly in competitive heating markets the Commission must ensure that the Heat Pump Action Plan does not distort functioning markets where sustainable heating solutions compete together for the good of the customers.

We remain available for further discussions.

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Nordenergi is the joint-collaboration between the Nordic associations for electricity producers, suppliers and distributors. Members are Swedenergy, Finnish Energy, Renewables Norway, Samorka, and Green Power Denmark. Overall, Nordenergi represents more than 2,600 market actors (member companies), most of them active in the electricity sector, but also in other areas such as district heating, gas, and services