

Public Consultation on a European Heating & Cooling Strategy

Eurelectric response

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal: D/2025/12.105/63

Electrification & Sustainability Committee
WG Industrial Competitiveness & Innovation
WG Buildings & Energy Efficiency

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Open public consultation - Questionnaire on the heating and cooling strategy

Fields marked with * are mandatory.

Introduction

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
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- ☐ Latvian
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- ☐ Portuguese

- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☒ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

* First name

Ioana

* Surname

Petcu

* Email (this won't be published)

ipetcu@eurelectric.org

* Organisation name

255 character(s) maximum

Eurelectric

* Organisation size

- ☐ Micro (1 to 9 employees)
- ☒ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

4271427696-87

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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Saba | ☐ Guadeloupe | ☐ Nauru | ☐ Switzerland |
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McDonald Islands | ☐ Niue | ☐ Togo |

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☐ Burundi	☐ Hong Kong	☐ Northern Mariana Islands	☐ Tonga
☐ Cambodia	☐ Hungary	☐ North Korea	☐ Trinidad and Tobago
☐ Cameroon	☐ Iceland	☐ North Macedonia	☐ Tunisia
☐ Canada	☐ India	☐ Norway	☐ Türkiye
☐ Cape Verde	☐ Indonesia	☐ Oman	☐ Turkmenistan
☐ Cayman Islands	☐ Iran	☐ Pakistan	☐ Turks and Caicos Islands
☐ Central African Republic	☐ Iraq	☐ Palau	☐ Tuvalu
☐ Chad	☐ Ireland	☐ Palestine	☐ Uganda
☐ Chile	☐ Isle of Man	☐ Panama	☐ Ukraine
☐ China	☐ Israel	☐ Papua New Guinea	☐ United Arab Emirates
☐ Christmas Island	☐ Italy	☐ Paraguay	☐ United Kingdom
☐ Clipperton	☐ Jamaica	☐ Peru	☐ United States
☐ Cocos (Keeling) Islands	☐ Japan	☐ Philippines	☐ United States Minor Outlying Islands
☐ Colombia	☐ Jersey	☐ Pitcairn Islands	☐ Uruguay
☐ Comoros	☐ Jordan	☐ Poland	☐ US Virgin Islands
☐ Congo	☐ Kazakhstan	☐ Portugal	☐ Uzbekistan
☐ Cook Islands	☐ Kenya	☐ Puerto Rico	☐ Vanuatu
☐ Costa Rica	☐ Kiribati	☐ Qatar	☐ Vatican City
☐ Côte d'Ivoire	☐ Kosovo	☐ Réunion	☐ Venezuela
☐ Croatia	☐ Kuwait	☐ Romania	☐ Vietnam
☐ Cuba	☐ Kyrgyzstan	☐ Russia	☐ Wallis and Futuna
☐ Curaçao	☐ Laos	☐ Rwanda	☐ Western Sahara
☐ Cyprus	☐ Latvia	☐ Saint Barthélemy	☐ Yemen

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- ☐ Saint Helena
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Tristan da Cunha
- ☐ Zambia
- ☐ Democratic
Republic of the
Congo
- ☐ Lesotho
- ☐ Saint Kitts and
Nevis
- ☐ Zimbabwe
- ☐ Denmark
- ☐ Liberia
- ☐ Saint Lucia

* Are you active (core business) in a field related to heating and cooling?

- ☒ Policy and advocacy
- ☐ Administration (planning, permitting, national or local administration)
- ☐ Energy utilities
- ☐ Finance
- ☐ Advisory services, energy service companies
- ☐ Energy communities or cooperatives
- ☐ NGO
- ☐ Manufacturing of heating and cooling appliances and systems
- ☐ Installation/sales or maintenance of heating and cooling appliances and systems
- ☐ Construction or building renovation
- ☐ Operators of district heating and cooling system
- ☐ Industry
- ☐ Operators of cogeneration plant
- ☐ Housing providers
- ☐ Data centres
- ☐ Other (please specify)
- ☐ Not active in this field

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

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Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

Part A - Scope

* 1. How relevant is the Heating and Cooling Strategy to the following objectives?

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮	Competitiveness
⋮	Decarbonisation
⋮	Energy security
⋮	Energy affordability
⋮	Energy efficiency
⋮	Sustainability and environmental protection
⋮	Fairness, consumer protection and empowerment
⋮	Addressing energy poverty
⋮	

Other (please specify)

100 character(s) maximum

It must primarily address the 1st 5 objectives, whereas the following 4 represent their sub pillars

2. How relevant for EU policy is the challenge of the growing cooling demand?

Rate from 1 (not relevant) to 5 (very relevant)

1) In buildings/space cooling	
2) In data centres	
3) In energy infrastructure	
4) In industry	
5) Other (please specify)	

Other (please specify)

200 character(s) maximum

Pharma, telecom, hospitals

Please specify how, according to you, this challenge is relevant for EU policy.

500 character(s) maximum

Demand for air conditioning, and therefore for electricity is increasing due to rising temperatures which impact productivity and well-being

The increasing role of AI and data centres is going to require large scale cooling systems.

In food and beverage industry, pharma and telecom, cooling represents a significant portion of their energy demand

Integrating cooling into energy & urban planning is essential for system resilience, cost-effectiveness & alignment with decarbonisation objective

Part B - Barriers

1. According to you, what are the key barriers to the **affordable decarbonisation of space heating?**

(please select up to 5 key barriers per building category)

	Residential - individual	Residential - collective	Non residential - public	Non residential - private
Regulatory complexity	☐	☐	☐	☐
Infrastructure-related barriers	☒	☒	☒	☒
Poor energy performance of buildings	☒	☒	☒	☒
High initial investment	☐	☐	☐	☐
High operational costs (eg electricity price)	☐	☐	☐	☐
High financing costs	☐	☐	☐	☐
Insufficient return on investment	☐	☐	☐	☐
Administrative/regulatory barriers	☐	☐	☒	☐
Length and complexity of installation	☐	☒	☐	☒
Technical barriers	☐	☐	☐	☐
Shortage of skilled professionals (planners, installers, etc.)	☐	☐	☐	☐
Long waiting time for installation	☐	☐	☐	☐
Lack of incentives for landlord and/or tenant in case of rental	☒	☒	☐	☐
Insufficient awareness, trust or unwillingness towards decarbonisation solutions	☒	☒	☒	☒
Lack of fit-for-purpose or easily available technologies	☐	☐	☐	☐

Other (please specify/develop)

200 character(s) maximum

- Taxation
- Insufficient (anticipatory) grid investment to ensure capacity for electrification
- Lack of skilled professionals

2. According to you, what are the key barriers to the **affordable decarbonisation of industrial process heat?**

(please select up to 5 key barriers for each temperature level)

	Industrial heat below 200°C	Industrial heat between 200°C and 500°C	Industrial heat above 500°C
Regulatory complexity	☐	☐	☐
Infrastructure-related barriers	☒	☒	☒
High capital cost	☒	☒	☒
High operational costs	☒	☒	☒
High financing costs	☐	☐	☐
Lack of access to clean energy contracts, including PPAs	☐	☐	☐
Length of permitting processes	☐	☐	☒
Lack of flexibility of industrial process	☐	☐	☐
Challenge to adapt or redesign industrial process to match renewable heat supply or electrification	☐	☐	☐
Impact on competitiveness vis-a-vis EU competitors	☐	☐	☐
Impact on competitiveness vis-a-vis international competitors	☐	☒	☒
Lack of technology adapted to specific needs	☐	☐	☐
Lack of operational standards adapted to specific needs	☐	☐	☐
Insufficient awareness, trust or unwillingness towards decarbonisation solutions	☐	☐	☐
Complexity and length of State aid procedures	☒	☒	☐

Other (please specify/develop)

200 character(s) maximum

Poor targeting and design of incentives, lack of stability in state aid mechanisms

*3. According to you, what are the key barriers to **affordable decarbonisation through efficient district heating and cooling in line with Article 26 EED?**

Maximum 5 selection(s)

- ☐ Regulatory complexity
- ☒ Infrastructure-related barriers

- ☐ Administrative barriers
- ☐ Technical barriers
- ☐ Skill-related barriers
- ☒ High initial investment
- ☐ High operational costs
- ☒ High financing costs
- ☒ Insufficient awareness or trust in solutions
- ☐ Lack of fit-for-purpose or easily available technologies
- ☐ Lack of available renewable resources
- ☐ Limits unnecessarily consumer choice
- ☒ Complexity and length of State aid procedures
- ☐ N/A

Other (please specify/develop)

200 character(s) maximum

Limited long-term impact of existing incentives and support schemes– due to poor targeting and design, lack of stability in state aid mechanisms, and lack of skilled personnel

4. According to you, what are the key barriers to **the deployment of thermal energy storage?**

(please select up to 5 key barriers for each sector of application)

	In industry	In district heating and cooling
Regulatory complexity	☐	☐
Infrastructure-related barriers	☒	☒
High initial investment	☒	☒
High operational costs	☐	☐
High financing costs	☐	☒
Administrative barriers	☒	☒
Technical barriers	☐	☐
Insufficient awareness or trust in solutions	☒	☐
Lack of fit-for-purpose or easily available technologies	☒	☐

Other (please specify/develop)

200 character(s) maximum

5. According to you, what are the key barriers to **the recovery of waste (excess) heat?**

(please select up to 5 key barriers for each source of waste heat)

	Industrial waste heat	Waste heat from data centres	Waste heat from other cooling and refrigeration processes	Waste heat from public infrastructure/ services (e.g. wastewater treatment, subway)	Waste heat or cold in energy production (power plants, LNG regasification)
Regulatory complexity	☐	☐	☐	☐	☐
Infrastructure-related barriers (e.g. access to district heating)	☒	☒	☒	☒	☒
High initial investment	☒	☒	☒	☒	☒
High operational costs	☐	☐	☐	☐	☐
High financing costs	☐	☐	☐	☐	☐
Insufficient return on investment	☒	☒	☒	☒	☒
Administrative barriers	☒	☒	☒	☒	☒
Technical barriers	☒	☒	☒	☒	☒
Barriers related to skills	☐	☐	☐	☐	☐
Insufficient awareness or trust in solutions	☐	☐	☐	☐	☐
Lack of fit-for-purpose or easily available technologies	☐	☐	☐	☐	☐

Other (please specify/develop)

200 character(s) maximum

In high-temperature heating networks, waste heat can be rather used in the form of separate micro-systems, which requires increased investment in the construction of new heating networks.

Part C - Policy options

- * 1. According to you, what are the **priority EU policy framework options** to accelerate affordable decarbonisation of heating and cooling?

Maximum 3 selection(s)

- ☒ Implementation of the current EU regulatory framework
- ☒ Additional public financing
- ☒ Additional policy initiatives (non-regulatory) including guidance on implementation of existing legislation
- ☐ Simplification of current legislative framework (towards 2030)
- ☐ New legislative framework (towards 2040)
- ☐ N/A

Please specify or complement if needed

200 character(s) maximum

- Waste incineration considered waste heat under art. 26 of EED
- Guidance on PEF.
- Guidance on national fiscal policies i.e removing unnecessary levies from electricity bill

2. Which regulatory or administrative barriers in the existing EU legislative framework need to be removed, and which incentives need to be strengthened or removed to accelerate affordable decarbonisation of heating and cooling and to simplify procedures?

500 character(s) maximum

- Gradually remove fossil fuel subsidies
- Implement ETS 2; strong carbon price signals under ETS1: use revenues for electrification
- Enable forward looking anticipatory grid investment
- Deploy Cfds, CCfDs, PPAs & give access to capital
- Align energy taxation with envi performance
- Eliminate taxes & charges unrelated to electricity from the bill
- Introduce electrification KPI in NECPs
- Joint planning of electricity, gas & heat networks at the EU, national & local level

*3. According to you, what are the **priority energy system design options** to accelerate affordable decarbonisation of heating and cooling?

Maximum 3 selection(s)

- ☐ Integrated planning of electricity, gas and heat infrastructure at EU level (including decommissioning of the gas grid or transitioning to renewable gases)
- ☒ Integrated planning of electricity, gas and heat infrastructure at national level
- ☐ Mapping of heat sources and demand at national level
- ☐ Mapping of future cooling needs
- ☒ Integrated planning of electricity, gas and heat infrastructure at local level
- ☐ Stronger integration of cooling in urban planning
- ☐ Support (in the form of guidance/financial assistance/technical assistance) to the implementation of local heating and cooling plans in line with Article 25 EED
- ☐ Cooperation between electricity grid operators and efficient district heating and cooling systems
- ☐ Planned gas infrastructure decommissioning
- ☐ Promotion of efficient district heating and cooling
- ☒ Enabling waste heat recovery e.g. through sectoral programmes in data centres, supermarkets, large commercial buildings etc.
- ☐ N/A

Please specify or complement if needed

200 character(s) maximum

Proper grid planning and investment is important for energy system integration using various technologies: CHPs, P2H, and heat storage, and ensure supply of clean electricity and heat

*4. According to you, what are the **priority options related to innovation** to accelerate affordable decarbonisation of heating and cooling?

Maximum 3 selection(s)

- ☒ Incentives for manufacturers of clean heating and cooling appliances and systems
- ☐ Obligations on manufacturers of clean heating and cooling appliances and systems
- ☐ Incentives for installers of clean heating and cooling appliances and systems
- ☐ Obligations on installers of clean heating and cooling appliances and systems
- ☐ Promotion of long-term contracts (heat purchase agreements)
- ☐ Promotion of de-risking schemes for efficient district heating development
- ☐ Promotion of third-party services in efficient district heating and cooling or industry
- ☐ Promotion of model public-private partnerships for waste heat reuse in district heating
- ☐ Promotion of replacement schemes or social leasing for clean heating appliances
- ☒ Promotion of business models that integrate financing and increase installations of clean heating appliances
- ☐ Promotion of renewable energy communities
- ☒ Rewarding of non-fossil flexibility in electricity markets
- ☐ Support to manufacturing of clean heating and cooling technologies
- ☐ N/A

Please specify or complement if needed

200 character(s) maximum

* 5. According to you, what are the **priority options to ensure affordability, just transition and consumer empowerment** in the context of the decarbonisation of heating and cooling?

Maximum 3 selection(s)

- ☒ Financial incentives to cover upfront investment costs
- ☒ Innovative services offer (heat as a service, social leasing of heat pumps, energy performance contracts)

- ☐ Regulated heat tariffs in efficient district heating or clauses to protect vulnerable consumers from raising heat costs
- ☐ Early involvement in heating and cooling plans at local level and in decision-making in relation to collective heating and cooling
- ☒ Public awareness campaigns on the benefits of efficient, clean heating and cooling solutions
- ☐ Regulatory measures (e.g. minimum energy performance standards for heating and cooling systems)
- ☐ Promotion of one-stop shops
- ☐ N/A

Please specify or complement if needed

200 character(s) maximum

- Align energy taxation with environmental performance
- Eliminate taxes and charges unrelated to electricity from the electricity bill, in line with the provisions of the APAE

*** 6. According to you, what are the **priority options for affordable and efficient space cooling?****

Maximum 3 selection(s)

- ☐ Awareness raising
- ☐ Reduction of the need for cooling (urban heat island effect), acting at urban level
- ☐ Better integration of cooling, including passive cooling, in urban planning
- ☒ Accelerated deployment of air conditioning and reversible heat pumps in priority buildings
- ☐ Stronger promotion of passive cooling (shading, ventilation etc) and hybrid cooling (passive plus active cooling) in buildings
- ☐ Permitting and administrative simplification
- ☐ Connecting cooling demand with cold sources (eg geocooling, waste cold, cold waters), including via district cooling
- ☐ Focus on vulnerable households
- ☐ Focus on public buildings
- ☒ Reinforcement of electricity infrastructure to better cope with increased power demand for cooling

- ☒ Development of demand-side flexibility services in cooling (good match of cooling demand and PV production peaks)
- ☐ Address barriers to cooling equipment in outdated building safety codes
- ☐ N/A

Please specify or complement if needed

200 character(s) maximum

Awareness raising & integration of cooling into urban planning, + reinforce electricity infrastructure to meet growing demand, considering benefits for GHG reduction, climate action & thermal comfort

***7. According to you, what are the **priority options to accelerate the affordable deployment of geothermal energy** ?**

Maximum 3 selection(s)

- ☐ Specific targets for geothermal
- ☒ Awareness raising
- ☐ Adaptation of mining codes
- ☐ Adaptation of water regulatory framework
- ☒ Permitting and administrative simplification
- ☒ Financial guarantees (de-risking)
- ☐ Policies to increase data availability
- ☐ Support to public acceptance
- ☐ N/A

Please specify or complement if needed

200 character(s) maximum

Use in high-temperature systems requires additional investment (in an already very costly investment) in geothermal water heating during winter. Limited geothermal resources

***8. According to you, what are the **priority options to accelerate the affordable deployment of solar thermal energy**?**

Maximum 3 selection(s)

- ☐ Specific targets for solar thermal
- ☒ Awareness raising
- ☐ Adaptation of regulatory framework
- ☒ Permitting and administrative simplification

☒ Financial guarantees (de-risking)

☐ N/A

Please specify or complement if needed

200 character(s) maximum

9. According to you, what are the **priority options to accelerate the affordable deployment of waste (excess) heat and cold recovery?*

Maximum 3 selection(s)

☒ Awareness raising

☒ Technical support

☐ Financial advice

☐ Targets for heat and cold recovery

☐ Adaptation of regulatory framework

☐ N/A

Please specify or complement if needed

200 character(s) maximum

Contact

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Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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