Brussels, 26 November 2026

Dear Executive Vice-President Ribera,

Dear Commissioner Dan Jørgensen,

In its Electrification Action Plan, the European Commission announced that it would propose a Heating and Cooling Action Plan and a Heatwave Action Plan in 2027. We welcome this commitment, given the importance of these issues for European citizens' energy bills, health and the environment.

We are writing to you about cooling, a growing concern across all Member States and an increasingly important issue for energy policymaking at both EU and national level. The debate so far has been too narrow. Passive and long-term solutions, such as greener urban spaces and better building insulation, as well as measures such as cooling shelters during heatwaves, do not receive the attention they deserve. At the same time, the discussion of active cooling risks overlooking choices that could lead to substantial waste of public money and missed opportunities for climate action and European strategic self-reliance.

As Europe approaches what could be a major wave of public investment in cooling, including support schemes for households, too little attention is being paid to which technologies Member States should prioritise. The evolving 'Made in Europe' debate must look beyond the place of final assembly to the materials and supply chains on which equipment depends throughout its lifetime. Key considerations include whether units can provide both summer cooling and winter heating, the emissions associated with their refrigerants, and their compatibility with the strong restrictions on PFAS refrigerants that we advocate.

First, we urge the European Commission to steer Member States' support schemes and public procurement toward reversible heat pumps that provide cooling in summer while partially or fully replacing fossil-fuel heating in winter, whether by replacing boilers or integrating heat pumps into existing heating and cooling systems.

Secondly, refrigerant choice must be treated as a strategic industrial decision, not merely a technical detail. Fluorinated gases remain widely used in this equipment. Many have a high global warming potential and face progressively tighter restrictions under the F-gas Regulation. Some lower-GWP alternatives are PFAS or break down into persistent PFAS, including trifluoroacetic acid (TFA).

To prevent further persistent chemical pollution from cooling in buildings and vehicles, we call for subsidies and public procurement to support only future-proof heat pumps and air-conditioning equipment using natural refrigerants, such as propane, subject to application-specific safety requirements.

Natural refrigerants offer a route to greater European material independence. Unlike fluorinated refrigerants, they do not depend on fluorspar, an EU-listed critical raw material whose global production is concentrated in a limited number of countries, notably China, and for which the EU relies almost entirely on imports. Instead, natural

refrigerants such as propane are produced and purified in Europe and do not depend on proprietary fluorinated refrigerant formulations.

Prioritising them would help build European supply capacity and reduce exposure to external supply bottlenecks. The objective should be European self-reliance in refrigerant supply and servicing, even under ambitious heat-pump and air-conditioning deployment scenarios, rather than replacing one strategic dependency with another.

Reliable cooling in care homes, schools and hospitals, and throughout the food cold chain, is essential. Public investment in this infrastructure should minimise exposure to imported critical feedstocks, price volatility and geopolitical disruption. A unit assembled in Europe is not strategically autonomous if its continued operation and servicing depend on vulnerable refrigerant supply chains. European resilience must therefore extend beyond manufacturing to the availability of refrigerants and maintenance throughout the equipment's lifetime.

This is a clear opportunity to align European strategic material independence with climate action, environmental protection, public health and industrial competitiveness. Europe should not use public money to lock essential cooling services into avoidable dependencies for decades to come.

Clear guidance in the forthcoming action plans, reflected in support schemes and procurement criteria, would create a predictable market for natural-refrigerant technologies, strengthen European manufacturing and servicing capabilities, and turn growing cooling demand into an investment in European self-reliance.

We hope these arguments will inform your work on the forthcoming action plans, and we would welcome the opportunity to discuss how they can help deliver climate protection, affordable cooling and European strategic self-reliance.

Your Sincerely

Patrick ten Brink

Secretary General



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