



**Response to the public consultation
of the European Commission
on the Heating and Cooling Strategy**

October 2025

CONTACT

MARCOGAZ AISBL

Rue Belliard, 40

1040 Brussels – Belgium

marcogaz@marcogaz.org

www.marcogaz.org

ABOUT MARCOGAZ

Founded in 1968, MARCOGAZ represents 30 member organisations from 21 countries. Its mission encompasses monitoring and policy advisory activities related to the European technical regulation, standardisation and certification with respect to safety and integrity of gas systems and equipment, rational use of energy as well as environment, health and safety issues. It is registered in Brussels under number BE0877 785 464.

DISCLAIMER

This document and the material herein are provided “as is”. All reasonable precautions have been taken by MARCOGAZ to verify the reliability of the content in this document. However, neither MARCOGAZ nor any of its officials, agents, data or other third-party content providers provides a warranty of any kind, either expressed or implied, and they accept no responsibility or liability for any consequence of use of the document or material herein.

The information contained herein does not necessarily represent the views of all Members of MARCOGAZ. The mention of specific companies or certain projects or products does not imply that they are endorsed or recommended by MARCOGAZ in preference to others of a similar nature that are not mentioned. The designations employed, and the presentation of material herein, do not imply the expression of any opinion on the part of MARCOGAZ concerning the legal status of any region, country, territory, city or area or of its authorities, or concerning the delimitation of frontiers or boundaries.

Marcogaz, the technical association of the European gas industry supports the EU's climate objectives and the decarbonisation of the heating sector.

The current strategy focuses on electric heat pumps and district heating networks only. While these solutions are valid, the energy savings benefits, particularly attributed to electric heat pumps, are often overestimated and should be assessed carefully, considering local conditions and climate variability.

Realistic and comprehensive cost-benefit analyses are essential, including direct costs to end users but also indirect system costs, such as investments in electricity grids updates, generation and storage capacity, and the construction and operation of district heating networks. This is crucial to avoid energy poverty resulting from overly costly or unsuitable choices.

In many cases, the installation of electric heat pumps is not feasible due to space constraints, need for extensive renovations of the heat distribution systems, and the high insulation standards required. Decarbonising the gas supply while maintaining existing infrastructure and appliances is often more cost-effective, system-efficient and quicker to implement.

A diversified and synergistic combination of technologies is more resilient and economically viable. Restricting this diversity risks excluding vulnerable households and slowing down the energy transition, due to affordability and energy transport system bottlenecks. Leveraging multiple energy networks and repurposing existing infrastructure can mitigate these challenges.

Renewable gases -biomethane, hydrogen and blends with natural gas- offer immediate and scalable decarbonisation opportunities with minimal conversion requirements. Biomethane production in Europe reached 22 bcm in 2023, with projections of up to 40 bcm by 2030. Imports of green gases from outside the EU, using existing or new infrastructure, can further support supply. These gases can be injected into existing networks, enabling continued use of efficient gas appliances while reducing emissions. Mechanisms such as green gas contracts and blending obligations already support decarbonisation of heating in several Member States and are explicitly recognised in the EPBD Recast. Appropriate certification schemes for gases used in boilers should be enabled for this purpose. To fully unlock this potential, clear and binding targets for biomethane use in the heating sector should be established.

A technology-neutral approach is essential to ensure all viable solutions are considered based on their actual carbon footprint and system impact. As public and private owners bear the cost of conversions, they must retain the freedom to choose the solution that best fits their needs. High-efficiency boilers already contribute to decarbonisation by replacing old inefficient appliances. They are affordable, widely available, compatible with existing infrastructure and now in large scale deployment. Hybrid heat pumps combining boiler and electric heat pump, offer flexibility and system efficiency, reduce peak electricity demand during cold spells, lowering the needs for electric grid reinforcement, they optimise transition costs for both consumers and the energy system. Gas heat pumps are growing popular particularly for high energy demand buildings combining heating and cooling needs, micro-cogeneration and fuel cells providing heat and local electricity production.

Beyond buildings, renewable gases and hybrid systems offer decarbonisation potential, particularly for industrial heating processes that require high-temperature heat.

Gas infrastructure plays a critical role in ensuring energy security, particularly during supply shortages, as a silent guard who constantly makes our energy supply stable and safe. The widespread transmission and distribution gas networks, operating alongside electricity networks, enable a faster and more cost-effective decarbonisation of the heating and cooling sector.