

SUMMARY OF THE NATIONAL ADVOCACY CAMPAIGNS AND THEIR RESULTS

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ABOUT THE PROJECT

Consumers Leading the EU's Energy Ambition Response through uptake of Heat Pumps (CLEAR-HP) is an ambitious adaptation of a tried-and-tested methodology, designed and developed to address consumers' needs, specifically in the adoption of heat pumps for space heating, cooling and domestic hot water production.

The **overall objective** is to facilitate consumers' access to heat pumps products by accompanying consumers throughout the whole purchasing journey, and by addressing financial and regulatory barriers.

The **specific objectives** are:

1. Consumer awareness and trust in heat pump products and available subsidies is increased and more than 40,000 consumers are ready to act and change their behaviour.
2. More qualified and skilled installers of heat pumps are available to consumers at national level.
3. Consumer investments in heat pump products increase.
4. Regulatory frameworks and financing schemes for easier adoption of heat pump products are simplified and more accessible for consumers.

Through the provision of trusted information, collective purchase schemes, an improved regulatory framework, and better access to qualified installers, CLEAR-HP will facilitate consumers' access to household renewables at an affordable price, thus allowing consumers to improve the energy performance and comfort of their homes and to reduce their energy bills in the long term.

The project activities cover [7 target countries](#), Belgium, Bulgaria, Italy, Portugal, Slovakia, Slovenia and Spain, where independent national consumer organisations are supported by BEUC, The European Consumer Organisation and the International Consumer Research & Testing (ICRT).

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INTRODUCTION

Following the project's main aim to facilitate consumers' access to heat pumps products, the objective of Work Package (WP) 3 was to shape regulations, policies and incentive schemes to enable consumers' active participation in energy markets and help them engage easily in EE and RES technologies, and more specifically in heat pumps.

The initial step towards achieving this objective involved analysing the relevant legislation and financing schemes in the target countries of Belgium, Bulgaria, Italy, Portugal, Slovakia, Slovenia, and Spain, as detailed in Deliverable D3.1. Following the assessment of national policies and legal frameworks, which included real-life insights, experiences, and feedback from consumers, policy recommendations were developed. These recommendations, tailored to the each country's specific conditions and current status of heat pump installations, were presented in Deliverable D3.2.

To facilitate the adoption of the project's recommendations, initial advocacy plans have been developed for all target countries. These national plans focused on the policy recommendations tailored to each country and included a list of stakeholders to be approached to achieve the set objectives and changes. The national advocacy plans also outlined various actions that project countries intended to undertake throughout the project's duration.

Initial plans proposed activities which were included in the calendars of activities for six-month periods. These plans were updated and reviewed by partners based on the evaluations of the previous periods and the situation in each country at that time.

This report summarizes advocacy activities in the target countries during the project, describes the implementation of advocacy plans, the results achieved, as well as barriers, and external circumstances that affected the fulfilment of the plans.



NATIONAL ADVOCACY PLANS

DESCRIPTION OF THE NATIONAL ADVOCACY PLAN DESIGN PROCESS

After assessing national policies and legislation in each country and development of policy recommendations for speeding up deployment of heat pumps in April 2024, the Work Package Leader prepared in very short time an Advocacy Plan template which guided partners develop their plans and deliver them in May 2024.

All countries had to select those policy recommendations which were applicable in their country, specify the stakeholders to be engaged for cooperation and advocacy in support of specific recommendations, outline the actions to achieve the agreed objectives and prepare a calendar spanning over 6 months, to be periodically readjusted every 6 months throughout the project implementation. When defining the national plan, each project partner had to consider the specificities of their market environment, including legal, political, social, technical and geographical aspects.

As part of the project Key Performers Indicators (KPIs), each partner was required to plan and implement advocacy activities, which had the potential to influence national policies and strategies, in particular to promote the integration of sustainable energy issues and household-level financing schemes related to heat pumps.

All initial advocacy plans were included in Deliverable D3.3 of the project which was submitted on 31st of May 2024.

SUMMARY OF NATIONAL ADVOCACY PLANS AND ACTIVITIES

BELGIUM

Policy recommendations and main messages set in advocacy plan

- Permanent VAT reduction for electricity
- Regional support schemes
- Lower vat for the devices and installation services
- Certified installers
- Legal framework for heat pump installation and maintenance
- Heat pump readiness understanding for all

List of targeted stakeholders

- Regional authorities in charge of energy and environmental management



- Federal authorities
- Regional Political Cabinets in charge of Energy
- Federal Energy Regulator
- Regional Energy Regulators
- Buildwise (Scientific and technic construction center)
- Belgian Heat Pump Association
- ATTB (Belgian Association for thermal Engineering)

Summary, description and timeframe of completed activities

The main messages in Testachats' advocacy activities under the project focused on reducing both upfront and running costs for heat pumps owners, while increasing consumer trust in this technology.

During the first reporting period, Testachats engaged with ministries at both regional and federal levels, as well as with regional energy authorities, professional associations, energy regulators, and district system operators.

Following these initial exchanges, we identified that several key elements were already present on the political agenda, including VAT reduction, a tax shift from electricity to fossil energy, VAT transfer from heat pump installations to fossil-based heating systems, and dynamic tariffs. At the same time, we observed that other aspects could become barriers if implemented too quickly, such as the legal framework for heat pump installation and maintenance. Testachats considered these aspects to be crucial for further activities to achieve these goals.

In May and June 2025, we met all key ministers at regional and federal levels and sent recommendation letters focusing, among other points, on VAT opportunities. As other actors were also advocating for this measure, by July 2025 the Federal government confirmed a tax shift that lowered levies on electricity while increasing them on gas and heating oil. This reform will be applied progressively until 2030, allowing citizen to anticipate bills increase.

This measure reduced the operating costs of electric heating, including heat pumps, while making fossil-based heating more expensive. At the same time, VAT on fossil fuel boilers was raised from 6% to 21%, reinforcing the price advantage of heat pumps. VAT for heat pumps was reduced from 21% to 6% for new and recently built homes (less than 10 years old). Together, these represent two major achievements in reducing both long-term running costs and upfront investment costs.

Exchanges with regional authorities also helped us better understand the lack of regulation regarding heat pump installation and maintenance. Authorities preferred to let the market evolve and professional skills improve before introducing legislation, which could otherwise discourage consumer investment. However, remaining silent was not an option, as building trust and encouraging consumers to switch to heat pumps required clear guidance.

In 2025, both Flanders and Brussels published guidelines for heat pump installations. Testachats used these guidelines during webinars to strengthen consumer confidence and in negotiations with our Collective Purchase Campaign (CPC) partner. We also consulted with the Flemish agency on the guidelines update process, and we shared our recommendations with the other two regions to support future regulatory developments. This work is expected to lead to legislative progress in 2027. For this reason, we did not pursue a legislative proposal ourselves but instead chose to provide input and recommendations to improve the existing guidelines.



After the Flanders region published their guidelines, a heat pump plan to support residential installations was established. Testachats received this plan in October 2025 and decided to send comments and proposal to improve it. Among the recommendations, Testachats placed particular emphasis on ensuring that the deployment of heat pumps for heating can be carried out while respecting consumer constraints and to prevent rejection of this technology:

- Priority for home insulation and reducing energy needs
- A stable financial support policy
- Smart control
- Electricity tariff for heat pump owners
- Consumer guidance
- Geothermal drilling in neighbourhood where possible
- Outdoor units installations aspects.

In parallel, Testachats exchanged with the scientific construction center *Buildwize* on the issue of upskilling installers. *Buildwize* was already preparing an Innovation Paper addressing the technical aspects of switching to heat pumps in home renovation projects. This paper is a collaboration between the three regions. The focus, however, remained largely on air-to-water heat pumps, with less attention given to hybrid systems. Yet hybrid technology represents a clear and wise option for households needing to replace a boiler while still completing insulation upgrades. To highlight this, we participated in a study day organized by a gas and energy federation together with industry and construction stakeholders. Our Flemish spokesperson, Mrs. Laura Clays, joined the discussion panel to present the possibility of hybrid systems combining air-to-air heat pumps with existing central heating systems. This approach allows households to replace fossil-fuel boilers with air-to-air heat pumps, offering a cheaper and simpler solution for consumers while enabling them to redirect savings into insulation investments.

Summary of activities in a nutshell:

Engagements

- Meetings held with Ministers at regional and federal levels.
- Exchanges with regional energy authorities, regulators, district system operators, and professional stakeholders.

Key Policy Elements Identified

- Already on the political agenda:
 - VAT reduction.
 - Tax shift from electricity to fossil energy.
 - VAT transfer from heat pump installations to fossil-based heating systems.
 - Dynamic tariffs.
- Potential barriers if implemented prematurely.
- Legal framework for heat pump installation and maintenance.

Strategic Focus

- Additional efforts invested in advancing VAT and taxation objectives.
- May–June 2025: meetings with all key ministers; recommendation letters sent highlighting VAT opportunities.



- July 2025: Flemish government confirmed tax shift lowering levies on electricity and increasing them on gas and heating oil.

Achievements

- Electric heating, including heat pumps, became cheaper to operate; fossil heating more expensive.
- VAT on fossil fuel boilers increased from 6% to 21%.
- VAT on heat pumps reduced from 21% to 6% for homes less than 10 years old.
- Two major outcomes: reduced running costs and reduced upfront costs.

Regulatory Developments

- Regional authorities preferred market evolution and professional upskilling before legislation.
- 2025: Flanders and Brussels published guidelines for heat pump installations.
- Guidelines used in webinars to build consumer trust and in CPC partner negotiations.
- Flemish agency consulted us during updates; recommendations shared with other regions.
- Legislative progress expected in 2027; focus remained on improving guidelines rather than proposing legislation.

Collaboration on Skills and Innovation

- Exchanges with *Buildwize* on installer upskilling.
- Innovation Paper prepared jointly by three regions on technical aspects of heat pump adoption in renovation.
- Focus mainly on air-to-water heat pumps; limited attention to hybrid systems.

Advocacy for Hybrid Systems

- Hybrid technology identified as a practical option for households needing boiler replacement while completing insulation.
- Participation in study day organized by gas and energy federation with industry and construction stakeholders.
- Flemish spokesperson Mrs. Laura Clays contributed to panel discussions, advocating hybrid systems combining air-to-air heat pumps with existing central heating.
- Approach enables replacement of fossil boilers, offers cost-effective solutions, and frees consumer resources for insulation investments.

Type of activity	Number of activities
Press Release	8
Breakfast specialized journalist	2
Legal framework for installation exchanges	2
Meetings with key political actors	6
Meetings with authorities	4
Meeting with construction stakeholders	2

Position papers/statements/letters	6
Workshop participation with construction stakeholders	1
Articles/ Publications	21

Barriers to plan implementation

The absence of a fully functioning Brussels government did have a measurable impact, mainly by delaying or freezing key decisions related to the energy transition. The evidence points to a slowdown rather than a complete halt, but the consequences are significant.

The political vacuum did not stop however heat-pump adoption, but it significantly slowed it, mainly by delaying regulatory clarity, incentives, and long-term planning. This effect was strongest in Brussels, moderate in Wallonia, and least visible in Flanders.

❖ Brussels has been the most affected region

Brussels already had the lowest heat-pump penetration due to its dense urban area, old building stock poorly insulated, limited space for outdoor units and uncertainty regarding the legal framework for outdoor unit installations (currently limited to guidelines), as well as heavy reliance on gas networks, which remain relatively inexpensive compared to electricity tariffs, thereby maintaining an unfavourable price gap.

The absence of a fully empowered Brussels government exacerbated these structural barriers.

How the political vacuum slowed things:

- **Delayed regional energy planning:** Brussels was unable to update or adopt new measures supporting heat pumps during the government gap. Incentive program is still on hold at the moment pushing citizens to wait for their investments.
- **Frozen decisions flagged by BRUGEL:** The energy regulator warned that key energy-transition decisions were “on hold” due to the political situation (network capacity investments decisions for example).
- **Missed alignment with EU heat-pump initiatives:** The EU’s heat-pump action plan was delayed by two years, and Brussels did not compensate with local measures.

Brussels experienced a slower uptake, lower renovation rates, uncertainty for installers and homeowners. This made the region the slowest of the three in shifting away from gas boilers.

❖ Wallonia: slowed, but for different reasons

Wallonia did not face the same government paralysis as Brussels, but it was still affected indirectly.

Factors slowing adoption:

- **Delays in national energy and climate planning** (NECP postponement) created uncertainty for regional subsidy frameworks which was suppressed and then launch again with a new format since December 2025 but after the closure of our collective purchase campaign on December 15th.
- **Lower renovation rates and higher rural gas/oil dependency.**
- **Less aggressive heat-pump incentives** compared to Flanders (air to air technology is not covered by this program).

The slowdown was moderate and not caused by political paralysis but worsened by national-level delays and the EU-wide slump in heat-pump sales.

❖ **Flanders is the least affected region but still slowed**

Flanders has the highest heat-pump adoption rate, the strongest renovation incentives including air to air technology if it is the main heating system and if photovoltaic panels are already installed to cover the cooling electricity and a clear ban on fossil-fuel boilers in new buildings.

However, even Flanders felt the impact of:

- EU-wide heat-pump sales slump (-47% in 2024)
- Delayed EU action plan
- Uncertainty around future standards

Flanders continued to grow, but below its potential trajectory.

Collaborations and joint initiatives with NGOs/NGO-coalitions

Testachats did not cooperate with other NGOs in advocacy activities within this project and did not participate in joint actions.

BULGARIA

Policy recommendations and main messages set in advocacy plan

- Financial schemes (subsidies)
- Predictable and sufficient subsidies for low-income households
- Strengthening consumers rights-one stop shops
- Smart meters

List of stakeholders to be involved

- Council of Ministers
- Ministry of Finance
- Ministry of Energy
- Ministry of Regional Development and Public Works
- Ministry of Environment and Water
- Ministry of Economy and Industry
- Ministry of Labour and Social Policy
- Sustainable Energy Development Agency
- Environmental Executive Agency
- National Assembly
- Political Parties
- National Association of Municipalities in the Republic of Bulgaria



Summary, description and timeframe of completed activities

Project activities, and particularly the advocacy component, started in early 2024, at a time when energy poverty and the social dimension of the climate transition were beginning to gain greater visibility on the national policy agenda. As an initial step, Bulgarian National Association Active Consumers (BNAAC) submitted a proposal to the Ministry of Finance, the Ministry of Energy, and the Ministry of Labour and Social Policy, focusing on financial support for energy-poor and vulnerable households for the replacement of conventional heat meters with remote-reading devices.

Considering the unstable political situation in the country and the upcoming early parliamentary elections in June 2024, BNAAC expanded its advocacy efforts. A proposal was prepared and sent to 16 political parties, calling for the inclusion of concrete measures aimed at improving energy efficiency and strengthening the role of households in their election programmes.

As in the initial period, BNAAC continued to implement its advocacy plan throughout 2025 with a strategic focus on financial schemes (subsidies), specifically advocating for predictable and adequate support mechanisms targeted at low-income households, while also addressing electricity price challenges and promoting the systematic introduction of smart electricity metering as a key policy instrument.

In July and August 2025, BNAAC actively contributed to the policy development of the National Social Climate Plan through targeted advocacy actions. These included the submission of both individual and joint proposals during the public consultation process, calling for differentiated and predictable financial support for households, with a strong focus on energy-poor groups. Key recommendations covered targeted subsidies for heat pump investments, the introduction of smart electricity metering systems, and the expansion of funding for high-impact energy efficiency measures such as solar thermal systems, air to air heat pumps (or air conditioners), and balcony photovoltaic installations. In parallel, BNAAC proposed a pilot results-based investment scheme for single-family buildings, linking financing under the Social Climate Plan to achieved energy efficiency outcomes rather than upfront costs.

A key outcome of BNAAC's work is its contribution to the development of Bulgaria's National Social Climate Plan, financed under the Social Climate Fund. This involvement contributed to the inclusion of several elements that are now part of the draft version of the plan. BNAAC opposed the application of 100% grant financing for the energy renovation of all multi-apartment residential buildings and proposed that full grant support be reserved exclusively for energy-poor households, while other households contribute co-financing of up to 40%, ensuring greater social fairness, financial sustainability, and more efficient use of public resources. In addition, the measures are extended to allow the installation of heat pumps as part of the supported interventions. In the 2.0 draft National Social Climate Plan, states this as follows: *"In order to ensure targeted support for the most affected and vulnerable households, the investment will provide 100% grant financing to the following target groups: households in a situation of energy poverty within the meaning of the Energy Act and affected by ETS2; ... Households outside the scope of the above-mentioned groups will be supported with 40% financing under the Social Climate Plan in order to achieve comprehensive renovation of buildings."*

Another key outcome is the explicit prioritisation of funding for multi-apartment buildings with the lowest energy performance classes, E, F, and G, where the potential for energy savings and emissions reductions is highest.

In addition, BNAAC proposed a new financing model for single-family houses, under which subsidies would be granted directly to households. Until now, no specialized and adequate state financing model for energy efficiency in single-family houses has been effectively implemented, and the results-based approach



proposed by BNAAC is intended to support individual or combined energy efficiency measures, rather than full renovations, while allowing households to freely select their own contractors for implementation.

Funding is explicitly linked to achieved performance rather than to comprehensive, fully subsidised renovation packages, thus ensuring greater flexibility, improved cost-effectiveness, and a substantial expansion in the number of households able to benefit from the scheme.

Part of the proposals were submitted through a formal position paper developed jointly with other NGOs active in the field of energy efficiency. In addition, further proposals were submitted on BNAAC's own initiative through separate communications. A number of these inputs were incorporated into the draft version of the National Social Climate Plan.

Type of activity	Number of activities
Legislative proposals*	6
Proposals for financing schemes	0*
Workshops	0*
Meetings	3
Position papers/statements/letters	0*
Joint actions	1
Articles/ Publications	2

**The legislative proposals presented in the table incorporate elements of proposals for financing schemes as well as position papers, statements, and letters; therefore, these activities are not reported as separate categories but only as legislative proposals.*

Barriers to plan implementation

In 2025, the political context in Bulgaria was characterized by a high degree of institutional instability, fragmented governance capacity, and the dominance of short-term political priorities, which significantly constrained the possibilities for achieving advocacy goals related to the establishment of sustainable schemes for heat pumps and renewable energy sources. Recurrent parliamentary crises and unstable majorities in the National Assembly shifted the focus away from strategic planning toward ad hoc solutions centered on budgetary stability, social compensation measures, and ongoing political conflicts.

Energy transition was present mainly at the level of formal commitment, without being transformed into an autonomous national priority supported by clear, long-term policy instruments. Furthermore, the structural influence of established energy actors, combined with administrative fragmentation and weak inter-institutional coordination, led to institutional delays and low political receptiveness to policies with deferred effects.

In this sense, the constraints on advocacy processes stemmed not from explicit political opposition, but from systemic inertia, the prioritization of short-term political legitimacy, and a deficit of governance vision for deep energy transformation.

Collaborations and joint initiatives with NGOs/NGO-coalitions

During the project, BNAAC collaborated with the following organizations:



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- Black Sea Energy Research Centre,
- Za Zemiata,
- Habitat for Humanity,
- EnEffect,
- WWF Bulgaria,
- Greenpeace,
- Sofena- Sofia Energy Agency,
- BACC,
- Institute for Circular Economy,
- New Bulgarian University Know-how Centre for Alternative Child Care,
- Economic Policy Institute,
- Green Policy Institute,
- Orion- Care for Leaders and Authorities Association,
- Team Sofia Association

As part of the cooperation between mentioned organizations an important position paper related to the Social Climate Plan of the Republic of Bulgaria was developed, which provides an objective analysis of the proposed measures, assessing their effectiveness, social fairness, and alignment with the real situation.

ITALY

Policy recommendations and main messages set in advocacy plan

- Smart meters
- Subsidies
- Lower VAT for the devices and installation services
- Create a list of certified INSTALLERS
- One stop shops
- Levies on electricity

List of targeted stakeholders

- MASE – Ministry for the environment and energy safety
- ENEA
- Acquirente Unico
- Ministry of Environment and Energy security
- Ministry of Finance
- Ministry of Industry
- Deputies
- Assoclimate



Summary, description and timeframe of completed activities

1. POLICY RECOMMENDATIONS IMPLEMENTED IN ADVOCACY PLAN

Smart meters

There was a need to establish technical rules for third-parties access to consumers consumption data collected by smart meters, provided fulfilment of GDPR rules and clear consensus of the owner of the data. This would allow consumers organisations to provide comprehensive support, advising consumers on the best tariff choice or offering energy advice tailored to their real consumption profile. Altroconsumo responded to a consultation paper from the energy authority (ARERA) on third-party access to smart meter data in September 2024.

Starting from 1 October 2025, these new rules governing third-party access to smart meter data are in force. Access requires third parties to be accredited by the SII (Integrated Information Service, managed by AU) and to be granted access by the consumer. Now that the regulatory framework is finally complete, Altroconsumo will need to test it to ensure that the procedures run smoothly and that access to data works without a hitch. This will probably be done over the next few months, after the end of the project.

Subsidies / Financing schemes

Italy has adopted support programmes over time, but these are always subject to annual confirmation by the government in office. Altroconsumo believes that such programmes should be permanent and stable, so that consumers can plan the adoption of heat pumps (HP) and other energy efficiency measures without pressure. Subsidies should also be designed to be long-lasting, benefit different types of consumers and not adversely affect the market by leading to increases in material costs, as it has been the case with many of the subsidies designed to date.

Already the 2024 State Budget Law drastically reduced all existing support programmes without distinguishing between energy efficiency interventions and conventional renovations. Previously existing support schemes (and especially the 110% Superbonus) were blamed for being responsible for large frauds and the huge financial deficit facing the state budget.

Since beginning of 2024, Altroconsumo joined forces with the most historical players in the field of energy efficiency buildings renovation to make our voices heard by the government. The Inter-associative Table of the energy efficiency building chain was born and started working to define a common strategy and requests to address to politicians during the approval of the 2024 State Budget Bill. It is still monitoring the legislative framework and advocating for the implementation of the EPBD directive, as a tool for better incentives design.

Despite Altroconsumo and the Intersectorial table “A heritage to save” efforts, the proposed amendments, reworded and tabled by several parliamentarians from both sides, were not accepted by the government. The outcome of the approving process of the State Budget Bill had one only positive content: (all kinds of) gas boilers were excluded from all subsidies in place. The new rules apply from 2025 and provide incentives of up to 50% of the costs incurred for main residences and up to 36% for other properties (so-called “second homes”), to be deducted from taxes payable to the state over a period of 10 years. Starting from 1° January 2026 these incentives are expected to fall to 36% and 30% respectively, a percentage well known to be insufficient to engage in deep renovations and inefficient to let emerge the so called “black economy” that widely characterises the building sector.

Furthermore, the long-awaited **Conto Termico 3.0** (Thermal Account 3.0), which promotes energy efficiency and thermal energy production from renewable sources in existing buildings, was finally approved in August 2025, but it will come into effect only in 2026. As a result, it didn't produce any tangible benefits for the purposes of collective heat pump purchasing campaign organized by Altroconsumo.



For air-to-air heat pumps, heat pump water heaters (air-to-water heat pumps) and hybrid heat pump systems, the Thermal Account 3.0 allows households to apply for a non-repayable grant of up to 65% of the cost incurred (if the project meets a series of requirements and certain levels of efficiency and energy savings) only in the case of replacement of an existing system and not for new installations.

The new State Budget 2026 (approved at the end of 2025) remains the only tool at stake to boost energy efficiency interventions. For this reason, Altroconsumo sent a document (early November 2025) commenting the actual draft State budget to the members of the Senate Budget Committee, document subsequently added to the records and published on the Committee's website. [Link to Senate website.](#)

Another letter pursuing the same purpose – namely to maintain current incentive levels and, if possible, increase those for energy efficiency - was also sent by the inter-sectoral coalition 'A Heritage to Save'.

The Energy Performance of Buildings Directive (EPBD) goals will provide future hooks to reiterate our demand for stable, fair and sustainable subsidies, in collaboration with the Inter-sectoral coalition for Energy Efficiency and Building Renovation (and in synergy with HORIS project).

What was done:

- **8 meetings** were held with the members of the Intersectoral coalition since July 2024.
- The Intersectoral coalition produced the document '*A Heritage to Save*', a call to action addressed to politicians to ensure the continuity of energy renovation support programmes. It organised an online **press conference** (for media only) on 07/12/2024 to present and launch the appeal. Media quotes are available at [this URL](#).
- The Intersectoral table sent **5 additional letters** advocating for goals in common with CLEAR-HP and HORIS (two letters in 2024 and 3 in 2025); Altroconsumo signature is present in all letters. Among these 5 letters, particularly relevant is a letter sent in mid-July 2025, which urged the approval of Conto Termico 3.0. This letter was also sent to MASE by the Intersectoral coalition for Energy Efficiency and Building Upgrading, on behalf of all 32 members of the coalition (trade associations, professional orders, businesses, consumer and environmental associations).
- On 07/11/2024 Altroconsumo sent **a document** to the Chamber of Deputies Budget Committee (31 parliamentarians) commenting on the draft budget law for 2025, arguing in favour of maintaining tax incentives of a certain significance so as not to halt the energy renovation process that had been set in motion with the Superbonus. A similar action was taken by the Intersectoral coalition during the same period.
- In July 2025 Altroconsumo wrote **a letter** to the Ministry of Finance (MEF) and the Ministry of the Environment and Energy Security (MASE), urging the approval of the *Conto Termico 3.0* and asking for the VAT reduction on heat pumps.
- Early November 2025, Altroconsumo sent **comments** to 23 parliamentarians – members of the budget committee of the Senate - on the new draft of State Budget law for 2026 (and the Intersectoral coalition sent its own letter on the same topic).

To be done:

AE will continue asking the government in office to reconsider its previous decision and improve the incentive rates, but only for energy efficiency measures that include, of course, heat pumps. We will work on this objective in synergy with HORIS and the inter-sectoral coalition for Energy Efficiency and Building Renovation. A proposal document for the adoption of new long-lasting incentive schemes which are fair for consumers and sustainable for state finances is currently being developed.

Lower VAT for the devices and installation services

HP are taxed at 22% while installation has a reduced VAT (10%). Currently, taxation at 10% of HP is only possible for an amount equal to the cost of installation; for the portion exceeding this amount, the taxation



raises at 22%. This mechanism creates a possible distortion on installation prices, which are kept higher to allow a reduced VAT on the equivalent part of HP cost. Altroconsumo asks for a 10% on HP devices whether the device is bought directly by the final user or by the installer.

What was done:

For this reason, **in July 2025 we sent a letter** (already mentioned above) to Ministry of Finance and Ministry of Environment and Energy asking for the VAT be reduced to 10% for heat pumps but we didn't get any feedback.

To be done:

We will reiterate the same demand in the coming months as a supplementary measure to support the adoption of heat pumps.

Create a list of accredited installers

The provisions currently in force do not guarantee consumers that they will be able to find effectively qualified and trained installers, who will also be able to provide all the information needed to obtain the possible tax relief that exists. Altroconsumo calls for the creation of publicly available and easily accessible lists of qualified installers, organised by local territory (provinces and cities), who have undergone training and refresher courses, to be made available to consumers.

There are currently still no databases that are easily accessible and searchable by the consumer to find a qualified installer. Those available on the Chambers of Commerce websites are limited to listing companies/professional registered with the chamber, thereby assuming that consumers already know the names of the providers they are seeking. However, for consumers seeking an installer without having a trusted contact, there are virtually no dedicated tools available beyond general Internet search engines. This shortcoming in the Italian market landscape deserves improvement, but it could not be addressed within the timeframe of the project.

To be done:

Over the next few months, we will try to address this issue by engaging the Chambers of commerce and probing the willingness of the Ministry of Economic Development, which oversees consumer protection, to support us in this endeavour.

One stop shop (OSS)

Altroconsumo is partner of HORIS, another EU funded project (under the LIFE Programme), which aims to create an OSS for home renovation. Horis is a digital information and support platform, a virtual OSS, that connects consumers and professionals to promote energy efficiency upgrades. Horis platform was released in May 2025 in Italy. It helps consumers identify the most suitable solutions to improve the energy comfort of their homes thanks to a renovation simulator that allows them to identify customised solutions and find qualified professionals. In the [News section](#), the Horis website describes the CLEAR-HP project in detail and provides a link to the purchasing group page. Other documentation produced thanks to Horis, such as webinars dedicated to heat pumps, will also be featured and promoted on the Horis website.

Levies on electricity

Altroconsumo demands that “general system charges” related to the various contributions and purposes not directly linked to the supply service be transferred to general taxation.

This has been partially achieved, although a residual portion of these costs (10% of the energy bill for domestic consumers) still remains. We will reiterate this request in the future, taking advantage of regulatory opportunities as they arise.



What was done:

- **On the 24th February 2025 we sent our Position Paper on energy and high bills** to all members of the Productive Activities Committee of the Chamber of Deputies and to the Minister of Environment and Energy.

2. STAKEHOLDERS TO BE INVOLVED

Altroconsumo has involved many of the foreseen stakeholders. Some of them, though, were not contacted, due to a series of reason that we explain below.

Stakeholder foreseen	Involved? (Y/N)	Remarks (why not)
MASE - Ministry for the environment and energy safety	Y	/
ENEA (National Agency for New Technologies, Energy and Sustainable Economic Development)	N	ENEA is not competent when it comes to design support schemes.
Acquirente Unico (AU)	N	Data readability has been spontaneously improved by AU.
MEF - Ministry of Economy and Finance	Y	/
MIMIT - Ministry of Industry and Made in Italy	N	It was not the right target for fiscal incentives and support schemes.
Deputies (& Parliamentarians in general)	Y	/
Assoclimate	Y	/
Environmental NGOs and civil society	Y	/

3. EXTRA ACTIVITIES

Events

Participation to specialized events regarding heat-pumps for networking & knowledge sharing.

- “*Mostra convegno expocomfort*” (March 2024)
- “Heat Pump Technologies” event (April 2025)

Meetings

- “*Osservatorio Regionale Clima, Economia Circolare e Transizione Ecologica*” (Lombardy Regional observatory on Circular Economy and energy transition) – 22/10/2024 - Altroconsumo attended a meeting organized by Lombardy Region about the promotion of FER as synergic target with the promotion of heat pump which are the heart of the CLEAR-HP project.
- Members workshop: “ESPR and beyond: what's next for sustainable products?” (03/12/2024) - Participation in a workshop about ESPR organized by ECOS and BEUC.
- Meeting with *Assoclimate* on 22/07/2024. Assoclimate (Associazione dei Costruttori di Sistemi di Climatizzazione) is the Italian association for manufacturers of heating, ventilation, and air conditioning (HVAC) systems, representing over 80 companies in Italy that produce components like heat pumps, chillers, fans, air handling units, and filters.

Synergies with other EU funded projects

HORIS

The activities of both projects aim to make the home environment more energy efficient. The aims of Horis and CLEAR-HP find a perfect match with the activities of the Intersectoral Table in which we actively participate to build proposals and solid claims due to the weight of the group of participants and their relevance. The goal of the table is to obtain the definition of a fair and functional incentive framework for the resumption of building energy upgrading activities.



STREET-HP RENO

Three meetings were held with members of the project, in particular with Edera, the coordinator: on 27/06/24, 03/07/24, 26/07/24. A joint webinar was held on November 21st 2024, called “The heat is on: can consumers warm to heat pumps?”.

Type of activity	Number of activities ¹
Legislative proposals: in general & for financing schemes	• 2 letters (Conto termico+VAT 10%) • 2 letters (Budget Law 2025) • 2 letters (Budget Law 2026) • 1 press release/conference (coalition) TOT: 7
Workshops	TOT: 5
Meetings	• 2 online meeting with stakeholders • 2 participation to physical events • 8 meetings with the Intersectoral coalition • 3 with Close with Gas (environmental NGO's) • 3 with STREET-HP RENO TOT: 18
Position papers/statements/letters	• 6 letters (also mentioned above) • 1 Position paper on energy & high bills • 1 Manifesto by Intersectoral table • 1 Arera consultation document • 3 press release about the project TOT: 12
Joint actions	• 1 workshop with STREET-HP RENO • 2 letters with the Intersectoral coalition (mentioned above) • 1 Manifesto (Heritage to Save) • 1 (HORIS) TOT: 4

Barriers to plan implementation

- The current political climate in Italy does not offer much scope for change. For this reason, Altroconsumo has chosen to act in alliance with other interested parties, creating a particularly representative interest group that works on regulatory deadlines that can lead to concrete results.

¹ Some activities have been counted twice since they belong to more than one category.

- We have postponed contact with ENEA and AU because they are not directly responsible for establishing incentives or support measures for the installation of heat pumps in homes. However, it is our intention to contact them at a later stage for longer term purposes to promote the uptake of sustainable and efficient technologies.
- Incentives: despite the approval of the *Conto Termico 3.0*, the set of incentives currently available is not attractive enough to make investments in energy upgrades. The timing of the duration of CLEAR-HP's purchase campaign group (mid-October) did not allow to assume mitigating measures other than intensifying communication activities to consumers, enhancing the existing incentives and discount conditions obtained by the buying group because in the future government incentives will decrease further.

Collaborations and joint initiatives with NGOs/NGO-coalitions

Altroconsumo attended meetings of the “Close with Gas” (*Chiudi col gas*) campaign, which was promoted by a coalition of environmental NGOs, including:

- CLASP
- Ecco
- Kyoto Club
- Legambiente
- WWF.

Altroconsumo presented the aims of CLEAR-HP and emphasised the alignment of our objectives with those of the Close with Gas campaign. They acknowledged the usefulness of our project as a viable solution for switching from gas and as a complement to their campaign.

As AE heat pump purchasing campaign was about to launch, we emailed them a set of communication materials for use on social media to spread the news. We also emailed them the calendar for the online workshop for consumers, together with links and instructions for enrolling on the webinars.

PORTUGAL

Policy recommendations and main messages set in advocacy plan

- Fiscal tools for the reduction of electricity prices
- Smart meters
- Subsidies
- Loans
- Lower VAT for the devices and installation services
- Promotion and information
- One stop shops
- Online tools

List of targeted stakeholders

- Parliament



- Fundo Ambiental
- APB/Banks
- e-Redes
- APIRAC
- AIPOR
- HORIS

Summary, description and timeframe of completed activities

Smart meters

Replacing old meters with smart devices, which communicate automatically and allow for the management and change of energy consumption is a fundamental step towards energy transition, as it allows for a modernised, smarter and more sustainable digital electricity network, the main benefits of which are:

- Empowering consumers: Access to detailed data on their consumption allows them to understand it and adopt more conscious and energy efficient behaviours.
- Advanced energy management: Accurate data collection enables consumer to manage energy consumption and production more efficiently.
- Integration of renewable sources: With real-time data, the network adapts dynamically and optimises the integration of renewable energy sources.
- Efficiency and loss reduction: Monitoring allows you to identify waste and implement operational improvement measures.

DECO PROteste monitored closely, with E-REDES – the company responsible for distributing electricity in mainland Portugal – the implementation of smart meters in domestic contracts during 2024. The national regulatory target period was accomplished by the end of the year 2024.

Financing schemes

The support programs launched in the past lack continuity over time and predictability, making it difficult for consumers to plan and risk fewer investments.

DECO PROteste has been advocating for well structured, stable and permanent fundings, as well as for a simplified process of application and evaluation. Due to the complex and bureaucratic process of evaluation, the consumers who have applied to past support schemes faced multiple obstacles to recover the money invested and were affected from a huge gap between the application and the compensation.

The lack of continuity also promotes market saturation whenever a new programme is launched, resulting in increased material and labour costs, which ultimately translate into investments that are significantly higher than the implementation of energy efficiency measures.

To address these obstacles and to propose solutions and establish our claims, DECO PROteste asked for a meeting with the competent authority responsible for managing the energy efficiency financing programmes, Fundo Ambiental. The meeting took place on the 8th of July 2024. Despite DECO PROteste concerns were well received, shortly afterwards, the Ministry of Environment and Energy announced the creation of the Climate Agency. This new Agency has taken over, formally, the responsibilities of the former Fundo Ambiental, in January 2025. Since then, DECO PROteste has been trying to organise a new meeting to revisit its proposals and claims. The transfer of competences to the new Agency led to nearly two years without the launch of new support schemes for improving energy efficiency and significant delays in the reimbursement of the upfront costs incurred by multiple families under the *Programa de Apoio a Edifícios Mais Sustentáveis* (completed in October 2023).



DECO PROteste continued to make efforts to try to get in touch with the Ministry of Environment and Energy to address the topic by sending 2 letters, one was sent on 10 December 2024, and the other was sent on 19 February 2025. The Ministry of Energy and Environment did not send any feedback upon our tentative contact.

In September 2025, the Ministry of Environment and Energy launched a new support programme, E-LAR, which aimed to help families, particularly vulnerable ones, to replace gas appliances with more efficient electrical appliances. E-LAR is a programme approved by the European Commission as part of the reprogramming of the Recovery and Resilience Plan, which aims to support consumers in the energy transition. Among the appliances supported by this programme, are induction hobs and conventional electric hobs, electric ovens and electric water heaters. Unbelievably, and despite the programme's objective of installing efficient equipment, heat pumps were not included.

For this reason, DECO PROteste sent a letter to the Ministry of Environment and Energy on 16 September 2025, to address its concerns and proposals. In the absence of a response and a change in the programme, on 22 September 2025, DECO PROteste issued a press release stating its position regarding the E-LAR programme.

The second phase of the E-LAR programme began on 11 December 2025, continuing to exclude heat pumps. Facing this, DECO PROteste issued another Press Release, on 12 December 2025, claiming among other improvements, the inclusion of heat pumps in the programme.

Reduced VAT – electricity bill + heat pumps

At the end of June 2024, the Parliament approved a new reduction in VAT on electricity bill. This measure came into force in the beginning of 2025. Since then, the amounts covered by the reduced VAT went from the first 100 kWh consumed each month, or 150 kWh in the case of large families, to 200 kWh and 300 kWh, respectively. Although we consider this is a step in the right direction, DECO PROteste still finds the measure insufficient. For this reason, we sent a letter to the government and parliamentary parties on 10 July 2024, reinforcing our claims, specifically that the VAT reduction should be applied to the entire bill, for all consumers and all domestic energies, with no exceptions.

Additionally, the reduced VAT for purchasing and installing heat pumps and photovoltaic panels was terminated on 30 June 2025, following the decision of the government, representing a huge step backwards and deviating from the European Commission's recommendations on this matter. In response to the government decision, on 23 June 2025, DECO PROteste sent two letters addressing both Ministry of Environment and Energy and the Secretariat of state of fiscal affairs claiming for the reduced VAT continuity.

Legislative proposals

On 7 October 2025, the Ministry of Environment and Energy made the *Plano Social para o Clima public*. This plan presents the strategy of investments to improve efficiency and decarbonization in the building and transport sectors for the period of 2026-2032.

Upon this plan, DECO PROteste alerted the Government that it was aimed exclusively at vulnerable families (consumers benefiting from social energy tariffs or low-income families) and beneficiaries who own properties occupied by vulnerable families, leaving out middle-class families. We also alerted that interventions in the passive elements of buildings (e.g. insulation in walls, floors, roofs and ceilings, and replacement of windows) represent very large investments that are unaffordable for most middle-class families. To meet decarbonisation targets and ensure equal access to decent housing conditions, it would be essential to create support measures that respond to the different needs of the population groups.

Recently, the Government has announced the launch of a new financial instrument in 2026, aimed at supporting energy efficiency interventions in the residential sector for middle-class families, meeting DECO PROteste recommendations and preoccupations. This measure is the result of a reform that will be financed by the Recovery and Resilience Plan (PRR) and will be managed by *Banco Português de Fomento* (BPF), with



technical support from the Climate Agency (APC). The new instrument, which takes the form of repayable loans, applies to the entire mainland, the Azores and Madeira, and supports interventions such as thermal insulation, heat pumps, efficient windows, shading systems, bioclimatic solutions - such as green roofs - renewable air conditioning, energy production for self-consumption, mechanical ventilation and water efficiency measures, as well as energy audits and certification.

The E-LAR programme is also mentioned in the *Plano Social para o Clima*, and so it is expected that the subsidy will continue during the next few years. Nevertheless, according to the plan, future editions of the E-LAR programme should include heat pumps, in line with the demands and multiple lobbying efforts carried out by DECO PROteste.

More recently, DECO PROteste submitted a set of recommendations and concerns to the Government as part of the public consultation process for the Decree-Law that partially transposes the Energy Efficiency Directive (EED).

Stakeholders' interactions and joint actions

On 11 April 2025, DECO PROteste was present at Tektónica, the leading trade fair and marketplace for the construction sector in Portugal, serving as a platform for business, networking and a stage for launching new products, solutions and innovations in the sector. The 2025 edition of Tektónica was attended by over 400 companies, both national and international. DECO PROteste secured some informal discussions with multiple stakeholders and professionals. To take the most advantage of the fair, DECO PROteste held some meetings to present the CLEAR-HP project and to explore potential synergies. The meetings held during the fair involved APIRAC – the Sectoral association for air conditioners, Architects Association and Engineers Association.

DECO PROteste held a second meeting with APIRAC to discuss synergies between the two organizations aiming to boost heat pumps market in Portugal and to hear from the Association which are the main concerns of the sector and needs regarding skills and training of professionals, as well as discussing the most recent data regarding installations in Portugal.

One stop shop

HORIS – Home Renovation Integrated Services, a project funded by the European LIFE programme, updated and advanced an existing digital retrofitting platform called [Green Menu](#). HORIS created a digital one-stop-shop (OSS) with the aim of empowering homeowners (of several building types, including flats) during the home renovation process. Homeowners face several key barriers when deciding to retrofit their properties, such as uncertainty and lack of trust about reported energy savings. In addition, they also must choose a home renovation professional and navigate the complexities of the financial process.

By offering financial, legal and technical solutions, HORIS facilitates a smooth customer journey, offering homeowners support on finding renovation professionals and guidance about financial schemes. HORIS matches financing, legal and regulatory, and technical solutions with specific building typologies and homeowners' needs to streamline action for home renovation, developing standardised contractual arrangements for home renovation. Heat pumps installation is among the multiple improvement measures provided by the platform. In such way, we made a [link](#) between projects presenting CLEAR-HP to consumers to show the advantages to install heat pumps using our collective purchase campaign. Also, in the advocacy meetings we had the opportunity to discuss synergies and needs of consumers for the installation of heat pumps.

As part of the HORIS consortium, DECO PROteste launched, in Portugal, the platform *Renovar Casa*, in May 2025.

Type of activity	Number of activities
Legislative proposals: in general & for financing schemes	6 Letters (Reduced VAT electricity bill, Reduced VAT HP, Financing schemes) 4 Press Releases (Financing schemes, reduced VAT in electricity bill) 2 Legislative proposals – public consultation (EED partial implementation, Plano Social para o Clima 2026-2032)
Workshops	5
Meetings	1 with Fundo Ambiental 2 with APIRAC (sectoral association for air conditioners) 1 with Architects association 1 with Engineers association 1 meeting with multiple stakeholders
Joint actions	1 HORIS 1 Plan4Cold
Articles/ Publications	26 online + magazine

Barriers to plan implementation

The high costs of heat pumps together with the constant and significant delays in the reimbursement of the upfront costs incurred by multiple families under the past financing schemes, as well as the complex and bureaucratic application processes, lead to greater uncertainty and lack of confidence in this type of programs and in these kinds of solutions.

Most of residential buildings in Portugal are inefficient. While the installation of heat pumps requires good house insulation to function efficiently, the public investment allocated to the implementation of energy efficiency measures in the housing stock still falls far short of what is necessary.

Lobbying activities that were not initially accounted for but were essential to continuing the work developed within the scope of the project had to be prioritised (e.g., delays in subsidy payments, reduced VAT for heat pumps termination, among others), so the planned action to create a channel of communication with banking institutions had to be postponed until early 2026. However, this activity remains in our planning, as it is a viable alternative to public subsidies, which have been scarce in the last two years, in terms of renovating the passive envelope of houses.

Collaborations and joint initiatives with NGOs/NGO-coalitions

DECOP had a meeting to discuss synergies between DECOP and APIRAC (Portuguese Association of Companies in the Thermal, Energy, Electronic and Environmental Sectors) to boost HP market in Portugal and to understand the main needs regarding skills and training of professionals, as well as discussing the most recent data regarding installations in Portugal, which according to APIRAC data stagnated in 2025.

DECOP participated in fair Tektónica to present CLEAR-HP project and ask for support in the dissemination. DECOP made contact with Architects association and Engineers association.

During informal meeting with some relevant stakeholders in Portugal organized by ADENE - Energy Agency to present the European project HQHeatpumpServices - “Boosting high-quality heat pump systems



in residential and office buildings with contracting services”, co-financed by the LIFE programme, DECOP discussed with NGOs ZERO (environmental protection association) and APIRAC the training and qualification of installers, and obstacles such as the high investment and bureaucracy associated with the implementation of heat pumps (particularly in multi-family buildings) stood out.

SLOVAKIA

Policy recommendations and main messages set in advocacy plan

- Reduction of VAT for electricity
- Carbon tax
- Special electricity tariff for heat pumps
- Dynamic prices
- Synergy with solar energy
- Smart meters
- Subsidies
- Loans
- Pay as you save/on bill schemes
- Lower VAT for the devices and installation services
- Lower property tax
- Reliable list of certificated installers
- Regular trainings
- One stop shops
- Online comparison tool
- Subsidies for multi-apartment buildings
- Legislation for heating in multi-apartment buildings

List of targeted stakeholders

- Ministry of Economy
- Ministry of Finance
- Ministry of environment
- Slovak Innovative and Energy Agency
- Slovak Environmental Agency
- Slovak Energy Regulation
- State Housing Development Fund
- Union of Slovak cities, UMS
- Association of Slovak cities and villages, ZMOS
- Slovak Association for Refrigeration, Air Conditioning and Heat Pumps
- Private banks/ Association of Slovak banks
- Suppliers



Summary, description and timeframe of completed activities

After designing the Advocacy plan, SOS launched the advocacy activities.

On 23 April 2024 SOS attended the Final round table of the project *Zelená dohoda pre budovy* (Green deal for buildings) in Bratislava. During the event SOS presented the project to some stakeholders and established contacts with the representatives of the Slovak Energy Agency and the organization *Budovy pre budúcnosť* (Buildings for the Future).

During the first period of activities SOS prepared introduction letters including information about the project, a short presentation of some of the policy recommendations and an invitation to cooperate on legislative changes. These letters were sent in September 2024 to the Ministry of Economy, the Slovak innovative and energy agency, as well as to the Union of Slovak cities.

The only response was received from the Ministry of Economy, on the basis of which an online meeting with representatives from several of its departments was held on 5 November 2024. During the meeting, SOS presented the policy recommendations of the project and proposed the Ministry of economy to incorporate them in the legislation. After a lengthy discussion, the ministry representatives didn't dispute the benefits of heat pump technology; however in light of their policy position and planned strategy, they didn't consider this technology to be a priority solution for Slovak households. Given that the gas network covers more than 90% of Slovakia's population and that gas has long been used for heating, the ministry considered it essential to maintain reasonable gas prices for households. From the perspective of expanding heat pumps deployment, the ministry considered the subsidy scheme *Zelená domácnostiam* (Green for households) as a sufficient, despite its unpredictable interruptions and subsequent restarts. For vulnerable households at risk of energy poverty, they did not consider heat pumps to be a solution, even if the installation was subsidized by the state, as these households would not be able to afford the increased electricity bills. On the issue of electricity prices, the ministry's goal was to maintain affordable prices, but without the intention of creating a special tariff for households with heat pumps. The meeting concluded with an agreement that SOS would submit the full set of policy recommendations to the ministry for further evaluation and possible areas of cooperation.

In connection with one of the recommendations promoted by SOS - namely the reduction of VAT on electricity, heat pumps, and installation services - SOS also requested the Ministry of Economy's support during the meeting to promote this reduction as an effective and quick tool for deploying heat pumps in Slovak households. However, as the parliament had only recently, in October 2024, through Act. No. 278/2004, increased VAT on heat pumps and installation from 20% to 23% and reduced VAT on electricity from 20% to 19% based on a proposal from the Ministry of Finance, it was not possible to obtain support for the implementation of this tool. Given the poor state of public finances and the government's decision to improve them primarily by increasing the burden on the people, SOS found no allies among state authorities to reduce VAT.

In September 2024, SOS with 32 other signatories, endorsed a joint call to the Slovak government entitled "Building renovation and energy efficiency as an opportunity to develop Slovakia".

On 12 and 13 November 2024, SOS participated in a major conference entitled "Decarbonisation of the Slovak Economy 2024" with representatives of the government, parliament, Slovak consumer authorities, European Commission representatives, consumer and civil organizations, Energy Regulator, and Energy agency. During the round table, SOS presented the CLEAR-HP project and its policy recommendations and led a discussion with stakeholders on the need for energy transformation and the role of heat pumps in it. After the conference, SOS held bilateral meetings and established contacts with the president of the Heat Pump Association and the director of the Dual Academy, where heat pump installers are trained. Following the



conference, SOS held an online meeting with representatives of the Dual Academy on 17 December 2024, to discuss opportunities for cooperation in the field of lifelong consumer education and training for installers.

SOS was invited to visit the training facilities of the Dual Academy and, following several rounds of discussions, signed a cooperation agreement with the Dual Academy on 12 September 2025 to support the training of heat pump installers.

In December 2024, SOS presented recommendations, best practices and recommendations in different working groups at the annual Energy Citizen Forum in Budapest.

On 13 March 2025 SOS organized a meeting with journalists in Bratislava and invited the president of the Slovak Association for Refrigeration, Air Conditioning, and Heat Pumps to present the heat pump technology and the current situation on the Slovak market. After the meeting, SOS and the association's president agreed to cooperate on improving the qualification of heat pump installers and increasing their information about consumer protection. The President also promised to help SOS with the content for the workshops organized for consumers within the project.

Subsequently, on 14 March 2025, SOS organized a press conference with regional journalists in Poprad.

Based on the cooperation with organization *Budovy pre budúcnosť* (Buildings for the Future), SOS was contacted by the Association of Mineral Insulation Manufacturers with the aim of creating a joint strategy to promote heat pump technology and the importance of proper home insulation. SOS established a long-lasting cooperation with this association in the fields of communication and advocacy. One of the actions within this collaboration was that SOS carried out a mystery shopping for mineral insulation producers in June 2025. The results of this mystery shopping were then presented at a press conference, a press release was issued, and articles were published. This communication highlighted the relation between proper home insulation and heat pump performance, as well as the benefits of heat pump technology.

On 6 June 2025, SOS participated in the conference “Risk of Stagnation – Discussion on Green Transition”. As the participants included representatives of the government, parliament, and other stakeholders, SOS's goal was to promote policy recommendations developed under CLEAR-HP.

On 24 and 25 June 2025, SOS participated in the CRiT Annual Political Dialogue, where CLEAR-HP recommendations were presented during a panel discussion entitled “Empowering People through Energy Policy in Coal Regions”.

In July 2025, the Energy Regulator requested a formal opinion from SOS on a proposal to introduce banded electricity tariffs based on consumer consumption levels. SOS outlined a number of arguments explaining why banded tariffs may fail to deliver the expected outcomes in terms of reducing consumption and improving energy efficiency, and warned that such system could pose increased risks for vulnerable consumers who are at risk of energy poverty. The SOS opinion also included a proposal to introduce a special tariff for users of heat pumps.

After SOS's unsuccessful efforts to arrange bilateral meetings and have CLEAR-HP recommendations reflected in legislative proposals and policy measures, SOS decided to contact several stakeholders again by sending them a translated version of all the recommendations, together with a request for a meeting and cooperation. At the end of June 2025, letters and recommendations were sent to:

- Ministry of Economy
- Slovak agency for environmental protection
- Slovak innovative and energy agency
- Buildings for future, Association of manufacturers



- Slovak academy of science
- Energy communities cluster
- Other partners and stakeholders

After the recommendations were delivered to the Ministry of Economy, an online meeting was organized on 12 August 2025, to assess the possibilities of implementing the CLEAR-HP project recommendations in the Slovak Republic, with the following conclusions:

Electricity price

The ministry's goal is to maintain low electricity prices in the long term.

Reduction of VAT on electricity

This matter falls under the competence of the Slovak Ministry of Finance. Given the ongoing consolidation of public finances, the ministry does not see any possibility for reducing VAT.

Faster introduction of smart meters

Regulation No. 258/2013 is currently in force, and the ministry considers that there is no scope for the unrestricted introduction of smart meters for all households, including those that do not meet the consumption threshold defined under the regulation. The associated costs for distribution companies are not currently considered to be realistically covered by alternative funding sources.

Special tariff for owners of heat pumps

The ministry is not aware of any initiative by the Energy Regulator to introduce banded tariffs with prices scaled according to consumption levels. The ministry is working on developing measures to ensure electricity prices remain low over the long term.

Self-production of electricity

The problematic provision regarding the sharing of electricity across different consumption points, requiring all points to belong to the same balance group with same supplier, is scheduled to be removed from 2026 through an amendment to the Energy Act. This amendment has long been advocated for by SOS.

Gas price

The ministry does not plan to launch information campaigns for the public on ETS2, the introduction of which will increase the price of gas. The current decision of the Slovak government to continue subsidizing gas prices for households almost nationwide - in 2026 for 90% of households - is supported by the ministry.

Subsidies

Currently, all funds in the *Zelená domácnostiam* (Green for Households) program allocated through 2029 are reserved. The ministry supports the continuation of this support scheme, but additional funding will need to be found. The ministry does not foresee the introduction of new measures to promote the development of renewable energy sources (RES), --

According to the ministry, consumer interest in heat pumps is sufficient and there is no need to support it with subsidies to reduce the upfront costs. At the same time, according to the ministry, the high prices of heat pumps will gradually fall as more households have pumps installed and suppliers will have to motivate potential new customers with lower prices. However, this view does not correspond with the figures from manufacturers, according to which a total of approximately 40,000 heat pumps were sold between 2022 and 2024, including non-residential buildings, and there are approximately 1 million family houses and more than 70,000 multi-apartment buildings in Slovakia.

Multi-apartment buildings

The ministry sees the possibility of developing RES in the form of heat pumps installed in multi-apartment buildings alongside the existing district heating infrastructure, not as a replacement for district heating. SOS has received several suggestions from multi-apartment buildings owners that heating suppliers, as well as current regulations, create cost and administrative barriers to the transition to renewable energy sources.

Improving the quality of installers

The ministry considers sufficient the current system of obtaining a 5-year certificate after passing an exam, with an extension of another 5 years after attending one training; more frequent testing and further training are not necessary from the point of view of the quality of installers' services, according to the ministry.

SOS also promoted the development of a reliable online comparison tool, to be managed by the Slovak Innovation and Energy Agency. After several unsuccessful attempts to collaborate on this initiative aimed at increasing consumer awareness, in February 2025 SOS updated its own [free online calculator](#), which allows consumers to estimate the operating costs of an air-to-water heat pump and the potential reduction in CO₂ emissions. SOS then asked the agency for a meeting to offer free sharing of this calculator by the agency. The online meeting took place on 7 November 2025. The discussion also covered the potential renewal of the *Zelená domácnostiam* subsidy scheme and explored the reasons why the *Zelená solidarita* scheme for low-income households is not very used by consumers.

Type of activity	Number of activities
Legislative proposals	9
Proposals for financing schemes	2
Workshops	2
Meetings	10
Position papers/statements/letters	2/1/10
Joint actions	4
Articles/ Publications	15

Barriers to plan implementation

Political situation:

- Since the government formed following the September 2023 elections, political developments in Slovakia have generated debate and public discussion both domestically and internationally. The governing coalition has enacted a range of legislative and institutional changes, [including amendments to the Criminal Code](#) and reforms affecting prosecutorial and judicial structures; these moves have been characterised by some observers as part of broader efforts to reshape public administration and legal frameworks. Public discourse around these reforms has been intense, with critics—both within Slovakia and among international stakeholders—citing concerns about impacts on the [rule of law, transparency, and institutional independence](#). These debates reflect broader societal divisions over the direction of domestic policy and its alignment with democratic norms and practices.



- Slovakia's foreign policy environment has also been a focal point of public and media attention, particularly in relation to the war in Ukraine and the country's diplomatic positioning within the European Union and NATO. Prime Minister Robert Fico's government has [adopted positions](#) that some see as seeking [to balance relations with Russia and Western partners](#); this has contributed to sustained public demonstrations. Large-scale protests under slogans such as "Slovakia is Europe" have taken place across multiple cities, with organisers voicing support for EU and NATO commitments and expressing concerns about perceived shifts in foreign policy orientation.
- [Legislative changes concerning the legal framework for non-governmental organisations](#)—initially proposed in 2024 and adopted in 2025—sparked significant civic engagement and mobilisations. Critics of the NGO legislation, including civil society groups and international actors, argued that some provisions could complicate NGO operations and reporting, drawing comparisons to similar debates in other European contexts and prompting public demonstrations. Thousands of citizens participated in protests against the proposed amendments, voicing concerns about their potential impact on civil society and democratic participation; the law subsequently faced legal challenges and constitutional review.

Economic situation:

- Increase of VAT from 20 to 23 % in January 2025, which resulted in an increase of heat pump sales at the end of the previous year.
- The inflation in Slovakia rose through 2025 and remained elevated into early 2026.
- A special transaction tax was introduced on 1 April 2025 for all entrepreneurs and the self-, applying to every bank transaction they undertake. This form of tax is unusual in the EU context: it is used only in Hungary and Venezuela, for example. Following the introduction of this tax, an estimated one in ten sole entrepreneurs and small or medium-sized businesses are considering ceasing operations.
- In 2025, due to consolidation measures introduced by the current government, 67 000 self-employed people, and more particularly small enterprises/installers, terminated their licences to trade, which is a historical record in Slovakia. There was also the lowest amount of newly registered licences – 43,000 – since the pandemic in 2025.
- According to the Debt Sustainability Monitor 2024, Slovakia has the highest risk of long-term sustainability of public finances in the EU.
- House prices in the last quarter of 2024 grew by 7.9 % year-on-year.
- One of the manufacturers of heat pumps in Slovakia, the company Hoval, has announced that up to 99% of its production is exported because there is no demand for heat pumps in Slovakia.

Gas vs Electricity:

- The Slovak government continues to provide households with a gas subsidy in 2025, as it did in 2023 and 2024. This means that the state compensates gas suppliers for a portion of the price that households would otherwise have to pay directly. The difference between the subsidized gas price and the regulated gas price set by the Energy Regulator—the amount households would pay without state support—is approximately 38 %.
- As a result of this subsidy, electricity becomes 2.5 to 3 times more expensive than gas, creating a significant price gap between these energy sources.
- Subsidies for renewable energy sources (RES) targeting households at risk of energy poverty, which cover 90 % to 100 % of eligible costs, cannot be applied to the installation of air-to-water heat pumps.



- Despite repeated expert recommendations to discontinue the general gas subsidy, it is expected that in 2026 it will again be provided to at least 90 % of the population, with an estimated cost to the state of €400 million. By comparison, the *Zelená domácnostiam* program, which supports investments in photovoltaic panels, heat pumps, and biomass boilers, was allocated only €107 million for a five-year period. These funds were fully used in less than a year and are currently no longer available.

Backlash of heat pumps technology:

- The publicly communicated support for heat pumps by EU authorities was interrupted, including the postponement of the EU Action Plan for heat pumps. This delay was exploited by some actors to create public uncertainty about the necessity of switching to this heating technology.
- Negative opinions about heat pump technology, and doubts about its efficiency, were expressed in Slovak media and public discourse by gas boiler manufacturers, major gas suppliers, the president of the Energy Regulator's office, and members of the government and parliament. These statements contributed to consumer scepticism and fostered a generally negative perception of the technology.
- SOS encountered numerous questions from the public regarding the efficiency and durability of heat pumps, including negative reactions on social media and critical feedback during promotional events, with some consumers accusing the organization of providing misleading information.

Collaborations and joint initiatives with NGOs/NGO-coalitions

SOS has established a partnership with the educational association Dual Academy (*Duálna akadémia, z.z.p.o.*) to support the enhancement of installers' qualifications. As part of this cooperation, the parties signed an agreement under which SOS provides training for installers, with courses organized by Dual Academy.

SOS also collaborates with the organization Buildings for the Future (*Budovy pre budúcnosť*), with both parties mutually supporting activities related to home renovation, the transition to renewable energy sources, and advocating for targeted state support for vulnerable households, while ensuring accurate and transparent information about ETS 2.

Additionally, SOS cooperates with the Slovak Energy Communities Cluster (*Klaster energetických komunít Slovenska*) to promote the establishment of energy communities and encourage households to participate in electricity sharing initiatives.

Finally, SOS continues to cooperate also with Association of Mineral Insulation Manufacturers (*Asociácia výrobcov minerálnych izolácií*), having prepared together workshops, articles and a mystery shopping to support and promote home insulation and effective installation of RES devices.

SLOVENIA

Policy recommendations and main messages set in advocacy plan

- Stimulate the offer of dynamic prices on the market
- Predictable and sufficient subsidies for HP purchase/installation for low/middle income households
- Establish check list of certified installers



- mandatory training of installers of heat pumps
- Strengthen the consumer rights with promotion, information and improvement of online comparison tool of NRA
- Initiate the establishment of ADR for HP purchase and installation disputes
- Facilitate disconnection from district heating system by easing the conditions

List of targeted stakeholders

- Ministry of the Environment, Climate and Energy
- NRA Energy Agency
- Eco Fund
- Chamber of Craft and Small Business
- Suppliers of HP
- Installers of HP

Summary, description and timeframe of completed activities

Disconnection from District Heating Systems

In the second half of June 2024, a legislative proposal was submitted to the Ministry of the Environment, Climate and Energy, and a formal letter was sent to the Energy Agency. Both initiatives aimed to propose easing the conditions for disconnection from district heating systems for multi-apartment buildings as well as single-family houses.

Currently, the legal conditions for disconnection from district heating are very restrictive. Disconnection is permitted only if two cumulative conditions are met: (1) the district heating system is not energy efficient, and (2) the end user designs and carries out a comprehensive energy renovation of the building, transforming it into a nearly zero-energy building. The proposed amendment seeks to ease these requirements by allowing disconnection if only one of the two conditions is fulfilled.

The Energy Agency was the only institution to respond. In its reply, the Agency stated that the existing conditions governing the right to disconnect are intended to protect district heating systems, provided that these systems operate efficiently. The Agency emphasized that each disconnection lowers system utilization, which consequently increases costs for consumers who remain connected. In its view, improving the energy efficiency of buildings should take precedence over changing heating sources. Furthermore, the Agency considers measures aimed at increasing the share of renewable energy sources in district heating systems to be a more appropriate approach.

In March 2025, ZPS submitted comments on the Act on the Promotion of the Use of Renewable Energy Sources. In its comments, ZPS once again called for easing the conditions for disconnection from district heating systems for both apartment buildings and single-family houses. ZPS argued that disconnection should be allowed if at least one of the statutory conditions is met, irrespective of the legally defined priority use of energy products. ZPS also emphasized that it does not generally encourage disconnection from district heating systems but supports it only in cases where consumers invest in renewable energy sources and energy-efficient technologies.

Establishment of Alternative Dispute Resolution (ADR) for Heat Pump–Related Disputes



At the end of August 2024, ZPS submitted a legislative proposal to the Ministry of the Environment, Climate and Energy and sent a formal letter to the Energy Agency concerning the establishment of Alternative Dispute Resolution (ADR) mechanisms for disputes related to the purchase and installation of heat pumps (HPs).

Currently, no ADR mechanism exists for resolving disputes arising from heat pump purchase and installation. As a result, consumers face numerous unresolved issues and are often forced to seek redress through lengthy and costly court proceedings.

ZPS proposed the introduction of a mandatory ADR scheme, which would require compulsory participation by heat pump suppliers and installers and would ensure that ADR decisions are binding on providers. This approach would significantly improve consumer protection, provide faster and more effective dispute resolution, and reduce the burden on the judicial system.

Mandatory Training for Installers

In September 2024, a legislative proposal was submitted to the Ministry of the Environment, Climate and Energy, accompanied by a letter to the Chamber of Craft and Small Business. The proposal included recommendations for introducing mandatory training for installers, including a compulsory knowledge test as part of refresher training. It also recommended incorporating consumer-focused content into the training programme.

At present, installer training is voluntary. The certificate of professional competence is valid for five years, and to extend its validity, installers are required to participate in refresher training. However, no additional examination is currently required as part of this process.

In January 2025, ZPS participated in an expert meeting of installers and energy engineers organised by the Chamber of Craft and Small Business, where it presented the legal obligations of installers towards consumers. This contribution was fully aligned with ZPS's recommendation to introduce mandatory training for installers and to integrate consumer protection-related content into the training programme. ZPS received very positive feedback from both the participants and the Chamber itself.

In March 2025, ZPS submitted comments on the Act on the Promotion of the Use of Renewable Energy Sources. ZPS proposed that mandatory training for installers be formally prescribed by law and that such training explicitly include information on consumer rights. In addition, ZPS recommended introducing a mandatory knowledge test following the completion of supplementary training, as this is the only effective way to ensure and verify the adequate professional competence of installers.

Checklist / Unified Register of Certified Installers

Several lists of certified installers currently exist on different websites; however, these lists are fragmented and not consumer friendly. ZPS has therefore advocated for the establishment of a single, unified list of certified installers, to be published and accessible across all relevant public contact points.

In October 2024, a meeting with the Chamber of Craft and Small Business took place, during which ZPS obtained the Chamber's support for these recommendations.

In March 2025, ZPS submitted comments on the Act on the Promotion of the Use of Renewable Energy Sources, again proposing the establishment of public registers containing a comprehensive list of all qualified heat pump installers. ZPS recommended that the registers include detailed information on installers' qualifications and training and be subject to regular verification and updates to ensure accuracy and reliability.

In November 2025, ZPS sent another request to the Chamber of Commerce to resume cooperation on legislative proposals for mandatory installer training and the establishment of a unified register of installers of heat pumps and other energy-efficient devices. ZPS is currently awaiting a response.

Predictable and sufficient subsidies for low/middle income households

In November 2024, ZPS provided comments on the draft Energy Efficiency Act in public consultations.

The proposed Energy Efficiency Act, aligned with the provisions of the EPBD, introduced additional protections for vulnerable households, which ZPS welcomed. However, ZPS believe that financial incentives should also prioritize low-income households, as the subsidies typically offered by the Eco Fund are often insufficient to enable these households to invest in energy efficiency measures. Regarding the proposal ZPS also held several informal discussions with Eco Fund as it determines the conditions of subsidies.

Strengthening Consumer Rights through an Online Comparison Tool

ZPS initially planned to strengthen consumer rights by promoting and improving the existing online energy comparison tool of the national regulatory authority, the Energy Agency. At the time of drafting the Advocacy Plan, the tool did not allow a comprehensive comparison of supplier offers, as key cost elements, such as fixed operating charges, were missing despite their significant impact on overall costs.

Following the Energy Agency's upgrade of its comparison tool, this recommendation was no longer applicable. However, due to the complexity of the upgraded tool and the extensive data input required, ZPS decided to use another comparator with more user-friendly comparison solution.

Within the CLEAR-HP and *Save Energy Together* projects, ZPS enhanced its regular monthly overview of household electricity offers by integrating a free price comparison tool in cooperation with the developer of the widely used *Tarifnik* application. The comparator is available on the [ZPS website](#) and enables a simplified comparison of electricity prices based on actual household consumption. Data on prices and contractual conditions are updated monthly.

The tool provides a comprehensive, impartial overview of electricity offers in one place, including information on contractual terms such as binding periods and early termination penalties. In October 2025, dynamic pricing offers were added, further improving consumers' ability to make informed supplier choices.

Review of Dynamic Electricity Pricing Offers and Recommendations for Improvement

At the time of preparing the Advocacy Plan, only a few electricity suppliers indicated on their websites that it was possible to conclude contracts with dynamic pricing. Even then, no concrete tariffs or sufficient consumer information were provided, and the option to conclude a dynamic pricing contract was not easily accessible.

Initially, ZPS planned to advocate for measures to stimulate the wider availability of dynamic pricing offers on the market. However, in autumn 2024, following requests from the Energy Agency, suppliers began to introduce dynamic pricing contracts. Consequently, ZPS adjusted its planned activities.

ZPS conducted a market review, analysing suppliers' dynamic pricing offers and their general terms and conditions, with a particular focus on whether consumers were provided with clear, reliable, and balanced information on both the benefits and risks of dynamic pricing. ZPS also addressed additional questions to suppliers and to the Energy Agency and received at least partial responses from most suppliers.

Based on the findings of the market review and the clarifications provided by suppliers and the Energy Agency, ZPS prepared a set of recommendations for improvement, which were published on its website. The following key recommendations and examples of good practice were highlighted:

- **Price capping:** As good business practice, suppliers should cap prices only upward and avoid downward price caps, allowing household consumers to benefit from negative market prices.

Upward unlimited prices entail a higher risk of high bills, as they expose consumers to wholesale market volatility, while downward price caps reduce potential savings.

- **Free choice between different energy sources:** Consumers should be free to choose between different energy sources, including renewable energy sources, when concluding dynamic pricing contracts.
- **Explanation of price formation:** Suppliers should explain, in a clear and understandable manner, how dynamic electricity prices are formed.
- **Transparency of costs and risks:** Before concluding a contract, consumers should be provided with clear and understandable information on all costs and risks associated with entering into and implementing a contract for the supply of electricity at dynamic prices.
- **Price information:** As a good business practice suppliers should provide users with daily and automatic updates on changes in electricity prices.

New network tariffs

In recent years, Slovenia's network tariff regulation has undergone significant changes, affecting individuals considering the purchase of a heat pump. Before the new tariff calculation methodology was introduced, the system for household consumers was relatively transparent and predictable.

The new regulation significantly changed the calculation of network charges by introducing more time blocks and seasonal differences based on grid load. As a result, network charges are higher during peak consumption periods, particularly in winter and at certain times of day. Consequently, users and potential buyers of heat pumps have raised concerns about significantly higher electricity costs.

As part of the implementation of a group purchase scheme, we had to address this issue appropriately, including by actively participating in all public consultations on amendments to the Act. Since its entry into force in 2022, the Act has already been amended ten times.

The comments and proposals we submitted during the public consultation in August 2025 related to the following points:

- fairer determination of the agreed charging power for the next period, which would allow for a more realistic assessment and significantly reduce the risk of unintentional exceedance of the agreed charging power;
- the possibility of a free change of charging power for household consumers;
- an obligation for distribution system operators to provide household consumers with free notifications (on the start of charging for excess power, on exceedance of the agreed charging power, and on related costs);
- in cases of insufficient measurement coverage not attributable to the consumer, the agreed charging power should be determined as the average power and consumption from the previous period with sufficiently reliable measurements;

The Energy Agency accepted our comments and amended the Act regarding the agreed charging power set by the distribution system operator. Household consumers who disagree with the determined power are now entitled to change it free of charge.

Type of activity	Number of activities
Legislative proposals	5
Proposals for financing schemes	1
Workshops	1

Meetings	2
Position papers/statements/letters	11
Joint actions	/
Articles/ Publications	2

Barriers to plan implementation

Overall, we can note that, in contrast to the CLEAR-X project, in the CLEAR-HP project we received little engagement from the Ministry and the Energy Agency. When responses were provided, they mainly consisted of explanations of their positions, without opening the opportunity for a broader discussion on consumer issues or project objectives. From this perspective, we consider the level of cooperation to have been limited.

ZPS did not receive sufficient support for the proposal to establish an ADR mechanism for disputes related to the purchase and installation of heat pumps. The Ministry of the Environment, Climate, and Energy has not responded, and consequently, no meeting with the Ministry has taken place. The Chamber of Craft and Small Business stated that such an ADR mechanism would place an excessive burden on providers and installers.

Regarding mandatory training for installers, the Ministry explained in its response that Directive 2018/2001 on the promotion of the use of energy from renewable sources does not require mandatory professional training. Consequently, such training is not obligatory in Slovenia, and the Ministry has no intention of introducing it. For this reason, a meeting with the Ministry of the Environment, Climate, and Energy has not occurred. ZPS will continue to collaborate with the Chamber of Craft and Small Business to advocate for the implementation of mandatory installer training.

ZPS held several informal discussions with the Eco Fund, which sets subsidy conditions, regarding financial incentives for low-income households, but received no support for the proposal.

Collaborations and joint initiatives with NGOs/NGO-coalitions

ZPS actively collaborated and networked with other non-governmental organizations (NGOs). In the framework of synergistic cooperation with other European projects, particularly the Save Energy Together project, ZPS introduced the CLEAR-HP project and its activities during three meetings of an informal campaign implementation group (CIG) dedicated to information sharing, awareness-raising, and the exchange of ideas on energy efficiency and energy saving. Members of this informal group are various stakeholders — representatives of municipalities, local energy communities, the Ministry of Environment, Climate and Energy, research institutes, and NGOs such as:

- Focus, Association for Sustainable Development
- IPoP, Institute for Spatial Policies.

At the first meeting in June 2024, ZPS presented the CLEAR-HP project and its main goals. During the second meeting in January 2025, the focus was on the collective purchase of heat pumps. And for the third meeting in October 2025, ZPS prepared an overview of the activities carried out within the CLEAR-HP project. ZPS also participated in several events organized by the NGO Umanotera, including the national conference *“Enough for Everyone”* in April 2025, where experiences, opinions, and ideas were exchanged.

SPAIN

Policy recommendations and main messages set in advocacy plan

- Reduction of VAT FOR electricity
- Special electricity tariff for heat pumps
- Synergy with solar energy
- Smart meters
- Subsidies
- Pay as you save loan (ESCO)
- On bill schemes
- Lower VAT for the devices and installation services
- Lower property tax (IBI)
- Clear and unified conditions for the supply of heat and hot water in multi-apartment buildings
- Clear administrative and technical guidelines for HP installation's site
- Attention to vulnerable consumers

List of targeted stakeholders

- Ministry for the Ecological Transition and the Demographic Challenge
- IDAE (Institute for Energy Diversification and Saving)
- CCAA (Autonomous Communities)
- Energy Agencies
- AGREMIA (Association of Companies in the Facilities and Energy Sector)
- CNI (National Confederation of Installers)
- FENIE (National Federation of Electrical Installations, Telecommunications and Air Conditioning Companies of Spain)
- CONAIF (National Confederation of Installers and Fluids Associations)
- AFEC (Association of Air Conditioning Equipment Manufacturers)
- FEGECA (Association of Manufacturers of Heat Generators and Emitters)

Summary, description and timeframe of completed activities

The Recovery, Transformation and Resilience Plan, launched by the Spanish Government in October 2021, aims to modernise the economy, boost growth and employment, and ensure a solid, inclusive, and resilient recovery after the COVID-19 crisis. Spain's plan totals €163.03 billion, with €23.28 billion allocated to the Ministry for the Ecological Transition for renewable energy, energy efficiency, sustainable mobility, and circular economy initiatives. All measures comply with the "Do No Significant Harm" principle, and 40% of funding supports climate change mitigation and adaptation.

Because of this national framework, OCU is working on improving this Plan by introducing measurements that help consumers with the installation of air to water systems for heating and cooling their homes. These measures need to be implemented not only alongside fiscal incentives and support schemes, but also with simplified administrative procedures to facilitate access.

Advocacy Actions done



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OCU submitted several formal proposals to the Ministry for the Ecological Transition and the European Commission (via Teresa Ribera and later Sara Aagesen) advocating for fiscal tools to reduce electricity prices, special tariffs for heat pump users, enhanced synergies with photovoltaic systems, mandatory use of smart meter data, simplified grants through one-stop shops, and updated installer certification. The Spanish Consumer Organization also emphasized support for vulnerable consumers. Strategic meetings were held with national authorities (IDAE, DGPLACE), regional authorities (Castilla-La Mancha, Region of Murcia), and industry associations (FEGECA, CONAIF) to align on policy priorities and implementation strategies.

- **Policy Advocacy and Legislative Influence:** OCU submitted formal proposals to the Ministry for the Ecological Transition and the European Commission (via Teresa Ribera and later Sara Aagesen) advocating:
 - Permanent 5% VAT on electricity and removal of non-essential taxes.
 - Special tariffs for heat pump users.
 - Enhanced synergies with photovoltaic systems (tax deductions up to 60%).
 - Mandatory use of smart meter data for consumer advice.
 - Simplified grants via one-stop shops and upfront disbursement.
 - State-level property tax reductions for energy-efficient installations.
 - Updated installer certification and support for vulnerable consumers.
- **Stakeholder Engagement:** OCU held strategic meetings authorities:
 - **National Authorities:** IDAE, DGPLACE.
 - **Regional Authorities:** Castilla-La Mancha, Region of Murcia.
 - **Industry Associations:** FEGECA (manufacturers), CONAIF (installers).

Achievements:

OCU advocacy efforts had influenced policy discussions on fiscal tools and renewable integration. OCU contributed to the revision of the national heating installation standard (RITE), proposing mandatory solar pre-installation, compatibility with low-temperature systems, hybrid storage solutions, and binding renewable targets for buildings. The recent *Real Decreto-ley 7/2025* incorporated several of their recommendations, including legal recognition of “self-consumption managers,” extended criteria for shared solar installations, inclusion of aerothermal and geothermal systems in community dwellings, and tax incentives (up to 50% IBI and 95% ICIO). Additionally, OCU advocated for transparency and consumer protection in the Proyecto RD “*Fomento combustibles Renovables*.”

OCU expresses a positive view of the draft Royal Decree for self-consumption legal framework, highlighting its support for collective self-consumption, citizen participation, and the simplification of procedures. The extension of the maximum distance for collective installations and the regulation of distributed storage is seen as significant advances. The obligation to provide detailed information on collective self-consumption in electricity bills is also valued for increasing transparency and consumer empowerment.

- **Policy Influence:** Advocacy integrated into discussions on fiscal tools, tariffs, and renewable synergies.
- **Regulatory Contributions:**
Input to RITE revision, proposing:
 - Mandatory solar pre-installation.
 - Compatibility with low-temperature systems.
 - Hybrid thermal/electrical storage.
 - Binding renewable targets for buildings.



Inputs to the national strategy on sustainability development, self-consumption legal framework, proposing:

- **Clarification for Communities:** request for a specific guide or protocol for homeowners' associations, clarifying rights and obligations and providing model agreements for energy sharing.
- **Self-consumption Manager:** proposal to define the technical profile and specific functions of the self-consumption manager, ensuring independence and consumer protection. Suggests mandatory periodic reporting to all associated consumers and mechanisms for complaints and replacement in case of conflict.
- **Measurement Equipment:** recommendation to introduce a sanction or compensation regime for distributors who fail to meet installation deadlines or resolve incidents, to protect consumers.
- **Billing Information:** request for a standard format and visual examples for collective self-consumption information on bills, plus consumer information campaigns.
- **Distributed Storage:** support for exemption from tolls and charges for stored energy but calls for annual publication of an economic and social impact report, with special attention to domestic consumers.

Inputs to the national strategy on sustainability development, self-consumption legal framework and Energy Markets document addresses the transposition of Directive (EU) 2024/1711, which aims to improve the configuration of the EU electricity market, enhance consumer rights, and protect domestic consumers during energy crises, proposing:

- **Multiple Suppliers:** identification and removal of barriers to consumers having multiple suppliers simultaneously, including clarifying roles, handling billing disputes, and managing supply interruptions.
- **Fixed Price Offers:** discussion on whether exceptions should be allowed for suppliers offering only dynamic pricing contracts.
- **Stress Tests for Suppliers:** recommendation to implement effective mechanisms and simulations to verify suppliers' solvency and operational capacity under price pressure.
- **Shared Energy Consumption:** identification of technical and administrative barriers, lack of IT infrastructure, and consumer information gaps. Calls for flexible geographic restrictions and regulation as an independent modality complementary to collective self-consumption, with special attention to vulnerable consumers.
- **Flexible Connection Agreements:** evaluation of whether current national regulations meet the Directive's requirements and suggestions for further alignment.
- **Additional Regulatory Aspects:** proposals to address further regulatory issues to fully comply with the Directive, including dispute resolution mechanisms and voluntary contract models.
- **Legal and Fiscal Reforms:** Real Decreto-ley 7/2025 introduce:
 - Recognition of "self-consumption managers."
 - Extended criteria for shared solar installations.
 - Inclusion of aerothermal/geothermal systems in community dwellings.
 - Tax incentives (up to 50% IBI and 95% ICIO).
- **Consumer Protection:** Advocated transparency and safeguards in Proyecto RD "*Fomento combustibles Renovables*."

Type of activity	Number of activities
Press Release	10
Breakfast specialized journalist	1 to be done in February 2026
Legislative proposals: Position papers/statements/letters	2
Meetings with key political actors	6
Meetings with authorities	4
Meeting with construction stakeholders	2
Workshop participation with construction stakeholders	1
Articles/ Publications	25

Barriers to plan implementation

Despite these achievements, significant challenges remain. Legislative uncertainty continues to pose a risk, as recommendations made during expert consultations often undergo substantial changes in Parliament, leading to dilution or omission of key measures. Administrative barriers, such as complex grant application processes and upfront cost requirements, discourage consumer adoption of renewable solutions. Limited consumer awareness persists, with many households lacking clear and actionable information to make informed decisions. Fragmented governance across national, regional, and local levels further complicates coordination and implementation. To address these issues, we have strengthened participation in sectoral events and proposed harmonisation tools, including one-stop shops and renovation passports, to improve transparency and streamline processes.

- **Legislative Uncertainty:** Risk of dilution during parliamentary processes.
- **Administrative Barriers:** Complex grant applications and upfront costs.
- **Limited Consumer Awareness:** Lack of clear, actionable information.
- **Fragmented Governance:** Inconsistent coordination across levels.

Mitigation Measures and Next Steps

Looking ahead, OCU organization will continue to engage actively with stakeholders to ensure effective implementation of new legislation and subsidies. OCU plan to maintain regular meetings with government bodies, manufacturers, and installers, and organize a special media-focused event in February 2026. In parallel, OCU will advance joint advocacy efforts by collaborating with partner NGOs to develop unified positions and proposals, amplifying their impact on national climate and energy policies. Monitoring legislative developments will remain a priority, enabling them to respond promptly with targeted interventions to safeguard consumer interests. Finally, OCU will promote inclusive policy design by advocating measures that prioritize affordability, accessibility, and protection for vulnerable consumers, ensuring a fair and just energy transition.

- **Continue Stakeholder Engagement:** Regular meetings with authorities and industry; special media event in February 2026.
- **Advance Joint Advocacy:** Collaborate with NGOs for unified positions.
- **Monitor Legislation:** Track parliamentary developments and intervene as needed.



- **Promote Inclusive Policy Design:** Ensure affordability, accessibility, and protection for vulnerable consumers.

Collaborations and joint initiatives with NGOs/NGO-coalitions

OCU participated as a speaker on a workshop about the decarbonisation of the households.

Within this workshop, OCU had the opportunity to present the CLEAR-HP project and the importance of improving the heating and cooling installations to get the compromissions of emissions and renewable energy sources at European level.

OCU keep working with the organizers of the workshops, the Alliance for a sustainable household to do more informing campaigns.



RESULTS OF ADVOCACY CAMPAIGNS

BELGIUM

Key Performers Indicators	
Name of Policy/Strategy integrating sustainable energy & financing schemes	Achievement Date
Reduction of VAT and electricity tax	July 2025 December 2025
Update of guidelines for heat pump installations	October 2025

Goals to reduce both running costs and upfront costs of heat pumps i Belgium were achieved by decision of federal government to lower levies on electricity and to reduce VAT for heat pumps from 21% to 6% for new and recently built homes (less than 10 years old). Testachats actively advocated for these measures.

Testachats consulted with the Flemish agency on the guidelines update process and shared recommendations with the other two regions to support future developments. This work is expected to lead to legislative progress in 2027. Moreover, Brussels Authority has confirmed key elements discussed during our meetings in their guidelines published on 26 of March 2025.

BULGARIA

Key Performers Indicators	
Name of Policy/Strategy integrating sustainable energy & financing schemes	Achievement Date
Targeted grants for multi-family renovations	16/12/2025
Priority funding for multi-family buildings in classes E/F/G	16/12/2025
Results-based household subsidies for single-family efficiency measures	16/12/2025

All mentioned KPIs are included in the draft version 2.0 of the Bulgarian Social Climate Plan following efforts and advocacy activities of BNAAC. The proposed measures and financing criteria are currently under discussion and being refined ahead of their inclusion in the final official version of the Plan, which is expected to be finalised by the end of June 2026.

Targeted grants for multi-family renovations include 100% grants for energy-poor and up to 40% co-financing for other households. Heat pumps are proposed as eligible devices for grants.

Results-based household subsidies for single-family efficiency measures proposed by BNAAC as the first specialized and adequate model of state financing for energy efficiency in family homes. This proposal adopted in the draft version 2.0 of the Bulgarian Social Climate Plan as results-based approach allows households to choose their own suppliers for installation and reconstruction works.



ITALY

Key Performers Indicators	
Name of Policy/Strategy integrating sustainable energy & financing schemes	Achievement Date
Conto termico 3.0	05/08/2025

Conto Termico 3.0 (Thermal Account 3.0, promoting energy efficiency and thermal energy production from renewable sources in existing buildings) was approved in August 2025, but it will come into effect only in 2026. Energy efficiency and renewable energy measures are included (e.g. heat pumps, solar thermal, biomass, photovoltaics).

The *Conto Termico 3.0* scheme allows consumers to apply for a non-repayable grant for air-to-air heat pumps, heat pump water heaters (air-to-water heat pumps) and hybrid heat pump systems.

- The incentive covers up to 65% of expenditure;
- it is paid in one instalment within 60 days of approval if the amount is less than €15,000;
- for larger amounts, it is paid in constant annual instalments.
- The advantage over tax deduction bonuses is that no tax capacity is required; the financial contribution is paid by the Energy Services Manager (GSE) and reduces the actual expenditure.

Altroconsumo had been awaiting approval since 2024, but thanks to the pressure Altroconsumo exerted with other stakeholders, it was finally granted in August 2025. However, the implementation timetable and the definition of the technical details mean that applications for funding may only be submitted in 2026.

PORTUGAL

Key Performers Indicators	
Name of Policy/Strategy integrating sustainable energy & financing schemes	Achievement Date
Amendment to E-LAR Programme: Future editions should include HP	07/10/2025
New financing scheme in 2026: Public loans to improve energy efficiency in residential buildings (targeting middle-class families)	11/12/2025

According to the *Plano Social para o Clima*, made public on 7 October 2025, future editions of the E-LAR programme should include heat pumps, in line with the demands and multiple lobbying efforts carried out by DECO PROteste. Upon this plan, DECO PROteste alerted the Government that it was aimed exclusively at vulnerable families (consumers benefiting from social energy tariffs or low-income families) and beneficiaries who own properties occupied by vulnerable families, leaving out middle-class families.

Recently, the Government has announced the launch of a new financial instrument in 2026, aimed at supporting energy efficiency interventions in the residential sector for middle-class families, meeting DECO PROteste recommendations and preoccupations. The financing scheme will be provided through the *Banco de Fomento* and may include an additional subsidy from the Environmental Fund, allowing citizens to improve the energy efficiency of their homes with more favourable conditions than those offered by commercial banks. Given that *Banco de Fomento* does not deal directly with the public, the loan should reach citizens through agreements with commercial banks, making the operation more agile and accessible. The financial



support is intended for energy efficiency works, such as replacing windows, installing thermal insulation in roofs, walls, and floors, implementing natural ventilation systems, heat pumps, solar panels, and improvements in water efficiency. The mechanism is mainly aimed at the middle class.

SLOVAKIA

Key Performers Indicators	
Name of Policy/Strategy integrating sustainable energy & financing schemes	Achievement Date
New financing scheme "Zelená solidarita"	28/10/2024
Amendment to the Energy Act	01/01/2026

The new financial program - "Zelená solidarita" - was launched on 28th of October 2024 by Slovak innovative and energy agency, after several years of calls to create special support for people at risk of energy poverty. This scheme is a modified version of the "*Zelená domácnostiam*" scheme and it is designed for low-income households. The criterion for receiving the subsidy is a maximum household income, and the financial support can cover up to 90% of eligible costs for the purchase and installation of photovoltaic panels, solar collectors or biomass boilers. Unfortunately, the Ministry of Economy has excluded heat pumps from this scheme; heat pumps remain available only under the "*Zelená domácnostiam*" scheme, which covers around 30-50% of costs. Currently, the "*Zelená solidarita*" scheme is still available, unlike in the "*Zelená domácnostiam*" scheme, the funds were used up very quickly, and it is currently unknown when and if this scheme will be available to households again.

The creation of the "*Zelená solidarita*" program, despite not including heat pumps, is a success of advocacy activities for the promotion of sustainable energy for low-income households.

Amendment to Energy Act No. 259/2025 adopted on 9th September 2025, which came into effect on 1st January 2026, adjusted the conditions for sharing electricity produced by prosumers so that surplus electricity can be shared regardless of where the production and consumption points are located in Slovakia (i.e., they do not have to be in the same balance group). Sharing is possible between different consumption points throughout the country. Until now, consumption point and production point within one sharing group had to belong to the same balancing group, which means that they had to have the same electricity supplier. This regulation significantly limited the sharing of electricity between consumers. SOS, as part of its activities, also in cooperation with Slovak Energy Communities Cluster, had long advocated against this limitation and asked the authorities to cancel this restriction, which would also help in terms of synergy between the production of electricity from photovoltaic panels, its sharing, and its use to operate heat pumps.

SLOVENIA

Key Performers Indicators	
Name of Policy/Strategy integrating sustainable energy & financing schemes	Achievement Date
Establishment and promotion of own online comparison tool	09/06/2025
Amendment on the Act on the methodology for calculating network charges for electricity operators	04/10/2025



Establishment and promotion of own online comparison tool

The initial objective was to strengthen consumer rights by supporting improvements to the Energy Agency's online energy price comparison tool. Following the Agency's upgrade, the tool became highly complex and required extensive data input, which limited its usability for consumers. Consequently, we opted for a more user-friendly comparison solution.

In cooperation with the developer of the Tarifnik application, we integrated a free electricity price comparison tool into our regular monthly overview of household electricity offers. The tool, available on [our website](#), enables a simplified comparison based on actual household consumption, with prices and contractual conditions updated on monthly basis.

Amendment on the Act on the methodology for calculating network charges for electricity operators

In recent years, Slovenia's network tariff regulation has changed significantly, affecting household consumers considering the installation of heat pumps. The introduction of a new tariff calculation methodology increased complexity by adding multiple time blocks and seasonal differentiation based on grid load, resulting in higher network charges during peak periods, particularly in winter.

In the context of implementing a group purchase scheme, we actively addressed these concerns also by participating in public consultations with comments on Amendments to the Act on the methodology for calculating network charges for electricity operators. The Energy Agency partially accepted our comments and amended the Act to allow household consumers to change their agreed charging power, determined by the DSO once a year, free of charge.

SPAIN

Key Performers Indicators	
Name of Policy/Strategy integrating sustainable energy & financing schemes	Achievement Date
Real Decreto-ley 7/2025	June 2025
"Self-Consumption Manager"	June 2025

Since the beginning of the project, OCU's advocacy has led to significant improvements in the consumer journey for clean heating solutions, particularly air-to-water heat pumps. The **Real Decreto-ley 7/2025** introduced legal recognition of heat pumps in community dwellings, enabling their integration with photovoltaic systems for maximum efficiency and cost savings. It also established **local tax incentives** (up to 50% reduction in property tax and 95% reduction in construction tax), reducing upfront costs for households.

Additionally, the creation of the **Self-Consumption Manager** role and the extension of the eligible radius for collective photovoltaic projects to 5 km simplify participation for apartment blocks and rural consumers. It facilitates combined photovoltaic + heat pump installations in multi-family dwellings. These measures, combined with proposals for simplified grants and mandatory use of smart meter data, make the adoption of heat pumps more affordable, accessible, and transparent, especially for vulnerable consumers.



CONCLUSION

The part of the project CLEAR-HP (Consumers Leading the EU's Energy Ambition Response through uptake of Heat Pumps) focused on advocacy activities that would facilitate the deployment of heat pumps and the transition to renewable energy sources in individual countries was a major challenge. Engaged consumer organizations faced significant complications in their countries, as well as external influences that hindered the planned process and achievement of results under WP3 of this project.

When evaluating the results of advocacy, it is necessary to emphasize the different political and social situations at the time of the project's creation in 2022 and at the time of the actual implementation of activities from 2024.

The EU Heat Pump Action Plan, which was presented in June 2023 and originally set to be published for the first quarter of 2024, was expected to be a great help in implementing the project. The original postponement led to its cancellation in 2025, which could be seen as a threat to Europe's energy transition, but it certainly resulted in at least a slowdown in the priorities of individual governments around renewable energy sources, especially sustainable heating for households. In some countries, this has also led to a return to promoting gas as a cheaper and long-term available commodity for households.

Unstable political situations in target countries, elections, and the formation of new governments did not help in the implementation of the project. For some partners, it even meant the loss of good relations with stakeholders and made it more difficult to establish new ones.

At the same time, economic conditions in countries and the need to improve public finances made it impossible to adopt more significant measures to make heat pumps more accessible for consumers.

When reviewing individual recommendations, which can be divided into basic groups of tools for reducing electricity prices, tools for supporting equipment financing, tools for improving the quality of installers, and tools for strengthening consumer rights and awareness, each of the partners, despite enormous efforts, implemented only partial measures. Our successes can be shortly described as follows:

- A reduction in VAT was recorded in Belgium and provided significant relief for consumers, while Spain introduced a reduction in local taxes
- New subsidy schemes were adopted in Italy and Portugal, and preparatory work for the creation of subsidies was completed in Bulgaria.
- Synergies with the facilitation of the introduction of photovoltaics and energy sharing were created in Spain and Slovakia.
- Slovenia and Slovakia have developed online comparison tools to help consumers assess the benefits of heat pumps.

Despite tangible progress being achieved primarily in certain of the targeted areas, partners also actively pursued actions linked to the broader set of recommendations, while building constructive relationships and cooperation with a wide range of stakeholders. In parallel, the partners made a meaningful contribution at national level to increasing consumer awareness of heat pump technology and improving access to reliable, clear, and verified information, thereby strengthening the foundations for future uptake.

In conclusion, it can be assessed that the recommendations developed within the CLEAR-HP project remain well-targeted and robust. No alternative or additional measures were identified during implementation that



would deliver the objectives more effectively or within a shorter timeframe. Under conditions of a stable and supportive political environment in the participating countries, their implementation would enable a substantial increase in the use of heat pumps in households, thereby making a positive and lasting contribution to climate change mitigation and the energy transition.