C.E.F.A.C.D

CEFACD commentary on the Proposed Revision of Regulation (EU) 2024/1103

11th February 2026

Introduction

CEFACD has concerns that the current draft amendment is technically flawed in several respects, insufficiently considers market diversity of appliance designs and usage profiles, and creates considerable manufacturer burdens without reliable evidence of corresponding efficiency gains. Technology-neutral, purpose-appropriate, and evidence-based ecodesign requirements would sustainably support both the Commission's objectives and the innovative capacity, diversity, and competitiveness of the European internal market. We expand in more detail on these themes in this paper.

Key Concerns

1. Timing and Regulatory Burden

Whilst industry broadly supports the aims of progressive Ecodesign regulation it is increasingly concerned about the increased burden on Manufacturers and other economic operators from rapid and multiple Regulation updates. The Regulation (EU) 2024/1103 only recently came into force, with manufacturers having had to invest significant resource and research, design and development into ensuring products met the July 2025 amendment. This rapid further amendment extends the burden again and need for further investment. When one considers that many manufacturers of local spaceheaters are subject to other regulatory updates – for example the gas Appliances Regulation, the Construction Products Regulation, Ecodesign for Solid Fuel local spaceheaters and a number of new and stricter standards that come into force, the burden in complying across all products is very significant and does not aid European businesses to be competitive or keep prices to consumers down. Furthermore we are concerned that ammendments are being made in such a short timeframe without systematic evaluation of the impact of the previous changes in achieving the regulations goals. This lack of evaluation of the impact of the previous regulation and market surveillance, creates uncertainty raises questions of why further regulation is required if we are unsure of the impact of previous regulation and risks being punitive to manufacturers who make every effort to comply. Stable regulatory conditions are essential for investment, particularly for highly regulated markets.

C.E.F.A.C.D. e.V. Amelia-Mary-Earhart-Straße 12, 60549 Frankfurt/Main, Germany
Office Brussels: Rue Marie de Bourgogne 58, 1000 Brussels, Belgium
Mail : info@cefacd.com - www.cefacd.eu
European Union 'Transparency Register' – ID: 936240218404-59
Bank Information:
Nassauische Sparkasse Wiesbaden – IBAN: DE59 5105 0015 0277 0067 63 – SWIFT-BIC: NASSDE55XXX

C.E.F.A.C.D

6. Impact on Small and Medium-Sized Enterprises

Cumulative effects particularly burden SMEs with lower economies of scale, limited supplier bargaining power, and restricted ability to pass costs to market. Repeated adjustments and recertifications can jeopardize product line viability and potentially cause market exits. Proportionate regulation should account for these structural differences and simplicity be sought wherever possible. Furthermore in regulatory impact assessments the entire holistic regulatory burden on manufacturers should be considered not just the impact of the core legislation.

2. Energy Consumption Outside Active Operation

The proposed standby requirements are technically ineffective for gas-powered local space heaters operating without electricity. Permanent pilot flames are often safety-critical and technically necessary and for example, gas appliances without electricity do not have an electrical standby mode. Applying standby logic from electrically operated appliances doesn't accommodate market technology diversity and creates testing burdens without real efficiency gains and could reduce appliance safety.

3. Smart and Self-Learning Functions

It should first be noted that many gas-powered heating appliances don't include smart or self learning functions. These functions are usually provided by external room controllers or accessories neither developed nor supplied by appliance manufacturers. Manufacturers cannot control energy consumption or control strategies of third-party components. Clear distinction between regulated products and optional third-party accessories is essential.

4. Temperature Control Requirements

While the goal of preventing overheating is shared, higher formal control accuracy doesn't automatically improve energy efficiency. For example in the case of mechanical, non-electric controls with capillary tube sensors, the measured room temperature depends on sensor positioning, room geometry, and user behaviour—factors with significantly greater efficiency impact than switching point accuracy alone. Tightening measurement specifications will likely increase cost, possibly complexity and this increased effort may not achieve efficiency gains.

5. Documentation Requirements

The proposed requirements aims to facilitate market surveillance but they will create considerable administrative burden for manufacturers. Minor adjustments to measurement methods or documentation often require extensive follow-up: recertification, CE report adjustments, data sheet updates, and operating instruction revisions. We would posit that this represents disproportionate economic burden relative to regulatory value. For manufacturers with broad portfolios, and especially SMEs this burden can be significant and again contribute to increased costs and reduce competitiveness.

C.E.F.A.C.D. e.V. Amelia-Mary-Earhart-Straße 12, 60549 Frankfurt/Main, Germany
Office Brussels: Rue Marie de Bourgogne 58, 1000 Brussels, Belgium
Mail : info@cefacd.com - www.cefacd.eu
European Union 'Transparency Register' – ID: 936240218404-59
Bank Information:
Nassauische Sparkasse Wiesbaden – IBAN: DE59 5105 0015 0277 0067 63 – SWIFT-BIC: NASSDE55XXX

C.E.F.A.C.D

7. Atmospheric and Comfort-Oriented Heaters

It should be noted that while all local spaceheaters allow heating in the space which they are installed, some local space heaters are designed for atmospheric, comfort, and design-oriented use rather than efficient continuous space heating. These products fulfil different functions with different usage expectations where users can choose to only heat the space in which they are thus aiding fuel poverty alleviation. Regulatory assessment comparing them primarily on efficiency criteria developed for continuous heating systems is technically and functionally simplistic due to the nature of why and how they are used in practice. Actual energy consumption is largely determined by specific usage profiles that differ significantly from traditional heating systems.

Recommendations

CEFACD urges the Commission to :

- respect differentiation according to appliance design, intended purpose, and usage profiles.
- ensure clear delineation between appliance manufacturer responsibility and for optional or external accessories
- consider the holistic regulatory burden being faced by industry and perform proportionality testing with special consideration for SMEs
- ensure regulatory (and ammendments) timelines that have evaluated impacts of previous regulations and consider the holistic impact on industry regulatory burden chronological sequencing of regulatory adjustments based on reliable application experience

ends

C.E.F.A.C.D. e.V. Amelia-Mary-Earhart-Straße 12, 60549 Frankfurt/Main, Germany
Office Brussels: Rue Marie de Bourgogne 58, 1000 Brussels, Belgium
Mail : info@cefacd.com - www.cefacd.eu
European Union 'Transparency Register' – ID: 936240218404-59
Bank Information:
Nassauische Sparkasse Wiesbaden – IBAN: DE59 5105 0015 0277 0067 63 – SWIFT-BIC: NASSDE55XXX