



OVERVIEW: we have grave concerns that the Ecodesign Regulation 2015/1185 review, (draft published 24 January 2025 on CIRCABC) is misguided, based on wrong data and will destroy an important European sector representing around 11 000 SMEs and 200 000 jobs. It is at odds with the European Competitiveness Compass and risks mass unemployment and will undermine European competitiveness and growth. It sets standards at a level that will see **almost 100% of new solid fuel local space heaters (LSH) disappear from the European market**. It risks giving international competitors an advantage by seeing European LSH replaced with appliances imported from outside the EU.

We remain deeply concerned that 1) legislation with such serious consequences is proposed under comitology, without thorough democratic scrutiny and 2) the most impacted stakeholder, the industry, are unable to access the European Commission's impact assessment during the consultation process.

With the transition to renewable energy in Europe still being developed and energy prices still high, domestic scale woodburning stoves provide a stable and manageable low carbon heat source, reducing the draw on electric grid and gas networks. Wood fuel production for LSH promotes the rural economy and wood fuel is a key economic driver in sustainable woodland management. It gives the most vulnerable population a cost-effective and low carbon means to heat their homes. It should be noted that 38% of European households heat their homes using solid fuel local space heaters, which amounts to more than 50 million appliances in use.

In annex, you will find the details of our concerns - annex 1 outlines overall concerns and Annex 2 provides technical details.

OUR REQUEST TO EU POLICY-MAKERS:

1. **European Commission publishes the impact assessment it is using.** We request consideration of the impact on jobs, growth and European competitiveness as well as evidence as to the importance of solid fuel local space heaters in achieving consumer protection, CO2 reduction, improving air quality, supporting EU-based manufacturing base and increasing energy resilience. We need to understand how the Commission concluded that the requirements put forward are achievable.
2. **The new testing regime is revoked, and test methods are only developed through a scientifically backed normalisation route (via CEN) approach and thresholds set only when those methods have been benchmarked and validated.** The new testing method would require all SFLSH to be redesigned without leading to better outcomes.
3. **Legislation places a realistic timescale for advancements in technologies** and does not place undue burden on the sector with unachievable targets that would destroy the industry.
4. **Parallel discussion and development of the revised Ecodesign and the Energy labelling Regulations** for (reversible) air conditioners & (reversible) heat pumps, comfort fans and local space heaters, as well as consistent and fair treatment of LSH when discussed alongside heat pumps.

5. **Stop the disproportionate burden brought on by double regulation for solid fuel LSH:** Double regulation under Ecodesign and CPR does not lead to better outcomes, it simply doubles the burden for manufacturers, regulators and consumers alike.

ANNEX I – overall impact

We support the goals of sustainable and CO₂-neutral heat generation and improved air quality. Our members work continuously to develop and manufacture efficient and clean products.

Solid fuel local space heaters are an economically important sector in the EU. The entry into force of the first Ecodesign Regulation in January 2022 has led to improvements in efficiency and a significant reduction in emissions from these products. Wood fuel, when sustainably produced and locally sourced, is a low carbon heat source that complements other heat sources.

The benefits of modern wood-burning LSH are not being recognized despite the fact that they:

- provide a sustainable low carbon heat for households,
- are a Eurozone centric industry providing revenue to local and rural economies,
- help reduce strain on the electricity and gas distribution system.

The Ecodesign Directive led to generational improvements to wood burning stove technology, reducing emissions in stoves and improving control and efficiency. Many manufacturers redesigned and retested complete product ranges to meet the requirements of the legislation, showing a hugely positive impact:

"Emissions from wood burning have been greatly reduced in recent decades, thanks to continuous research and technological development in the area. This is shown by the results of the competence-building project SusWoodStoves." SINTEF

However, the sector has voiced concerns about over-regulation. The increased testing and recertification from new harmonised standards under the revised Construction Products Regulation will force manufacturers to re-test, re-certify and in some cases re-design products. **The new testing regime and technology requirements in the working papers of the new Ecodesign requirements will require all SFLSHs to be redesigned and further tested with consequent increased administrative burden.** The burden being placed on manufacturers is disproportionate and inconsistent with better regulation aims. As a result of this, the industry does not feel heard by the European Commission, despite clear evidence and consistent unified messaging.

What are the impacts?

Impact on citizens: wood heating appliances will continue to be actively devalued despite the advances in technology and performance. This makes them subject to disproportionate levels of regulation, and less

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affordable for householders and citizens who rely on local wood-fueled space heating. This would leave European citizens worse off, given that over 41 million Europeans are already unable to keep their homes adequately warm (Eurostat). SFLSH provide a locally generated, affordable energy choice to consumers at a time of ongoing challenges of security and energy affordability.

Impact on economic sustainability: The requirements are not aligned with the reality of what SFLSHs technology is currently able to provide and imposing unrealistic standards will destroy this European industry and give foreign alternatives an advantage. This has a direct impact on EU SME economic sustainability in our sector. This threatens the future of a European industry. **LSH are a European produced technology - 95% of local space heater appliances in Europe are produced in Europe and is largely made up of European SMEs, supporting around 11 000 SMEs and around 200,000 jobs.**

If there is the lack of a credible alternative in the market for effective wood burning, this could lead to open fires being maintained in rural areas. This is inefficient and increases emissions. The wood fuel supply chain is an important contributor to the rural economy; reducing this sector will actively work against territorial cohesion. Additionally, the bioenergy sector is the EU's largest sector for heating, employing 550,000 citizens.

Impact on drive to net zero: Replacing gas and electricity heating with low-carbon wood heating would reduce emissions, but substituting these with other fuels will lead to higher carbon emissions until grid electricity is fully generated from renewable sources and only green gas is used in the energy mix. This contradicts the EU's drive to net zero and will directly impact on our climate mitigation strategies. The EU defines biomass as a renewable energy source (Article 2.1 of Directive (EU) 2018/2001, including the amended version by Directive (EU) 2023/2413).

Biomass for energy continues to be the main source of low carbon renewable energy in the EU and accounted for about 59% of the renewable energy consumption in 2021. Burning wood in high-efficiency space heaters is very efficient and controllable. All low carbon technology should be promoted not deprecated.

ANNEX II – technical details

In the below text, we refer to the draft document for the revision of the Ecodesign Regulation (EU) 2015/1185 that the European Commission published on 24 January 2025 via CIRCABC.

The Draft working papers for the consultation forum for the Ecodesign Regulation update introduce a number of burdensome items. By way of example, we present several below:

1. *New non-validated test methods without validated data base for solid fuel local space heaters combined with inappropriate limit values as a basis for European legislation – these methods have been arbitrarily introduced with no benchmarking to ensure achievable limits. On the basis of the proposed thresholds almost all appliances on the market would not comply*
2. *The requirement of for automatic combustion control systems, additional testing, second conformity contradicts Ecodesign principles: it increases costs, energy consumption and maintenance need, limits technological neutrality and makes appliances more expensive. Proper standardisation process is required to ensure safe products are produced.*
3. *Lack of clarity on the origin and coherence of the benchmarks, combined with significant changes to testing and calculation procedures, raises concerns about credibility and appropriateness of data used to set these benchmarks. For example, the introduction of particle counting – there is no suitable test standard these have been research tests only.*
4. *Increased burden on manufacturers – accelerated development and product replacement, Increased testing, increased appliance, installation and maintenance costs a second Conformity Compliance regime. Entry into force in 2027 is unrealistic as it places an unreasonable burden on manufacturers, especially SMEs, with insufficient time for re-testing, re-certification and necessary product re-design.*

Technical considerations

1) New and not validated test procedures and methods in combination with inappropriate thresholds

The completely inadequately described test methods for wood-burning local space heaters in the draft of 10 January 2025, leave considerable room for interpretation and implementation in terms of reproducibility and validation. This clearly contradicts the argument that the test methodology in the EN 16510-x standards harmonised under the European Construction Products Regulation is inadequate.

Furthermore, far from reflecting reality, it describes a test scenario that deviates from EN 16510, is fixed defined and poorly specified.

Various measurement method options have been discussed by the Commission:

- EN 16510x test method with minor adaptations;
- Norwegian measurement method with particle measurement in the dilution tunnel and testing at four output levels;
- Load cycle test with a fixed test sequence based on the method of the German "Blue Angel" eco-label for wood-burning stoves.

There are approximately 10.000 test reports based on the EN 16510 method, including its predecessor EN 13240. About 750 test reports are based on the Norwegian method, and there are only 10 reports based on the "Blue Angel" method.

The selected test methods for wood log appliances according to Annex IIIa have not been validated, and a database for a completely new European test method and corresponding limit values is not available.

In addition, there is no validated test method for the required particle count for wood-burning appliances, and the existing methods are controversial even for petrol engines. The constant changes in the appliances and the flue gas system during the combustion process make PN measurements absurd.

With regard to the determination of the emissions, a simple addition of the measured emission values of wood-burning appliances, as defined in the draft, does not correspond to the actual impact on air quality, as the amount of flue gas varies according to the output level, and this must be taken into account in the calculation.

Setting limit values for emissions and efficiency for solid fuel local space heaters in combination with new, unvalidated test methods within the framework of European legislation is in principle highly questionable. In addition, the existing limit values, which are based on completely different test methods, have been significantly tightened.

It should also be noted that the requirements stipulated by these draft papers make no reference to safety testing implications that may be required if stipulating technology which can influence air supply, evacuation of products and electronic control. These should be considered fundamentally or else the risk of unsafe products being placed on the market becomes a possibility.

2) Requirement of additional features

The draft makes the installation of an automatic combustion control (ACC) mandatory for all appliances. Only a very small proportion (around 3-4%) of appliances currently on the market are already equipped with this technology.

ACC is used to minimise the influence of the user, especially when adjusting the air supply. The air supply is automatically regulated to optimise combustion and keep emissions as low as possible.

However, this form of automatic regulation has nothing to do with regulating the heat output according to the room temperature, as it is common with other heating systems, including pellet appliances. With a wood log appliance, the heat output is mainly influenced by the amount of fuel that the user feeds into the stove. Products with an automatic wood log supply do not (yet) exist. The requirement to regulate the air supply in relation to the room temperature is therefore technically absurd for log-burning appliances. In fact, control based solely on room temperature can lead to very poor combustion and therefore increased emissions.

Apart from increasing the selling price of an appliance, this directly contradicts the very objective of eco-design, which is to save energy. This could have It has the opposite effect, as the appliances lose their independence from the grid and require additional energy to operate.

Additionally, any Ecodesign regulation should not favour specific technologies. It should be technology-neutral and allow manufacturers to choose how to meet the regulation's requirements. If this can be achieved through manual or mechanical damper control, this has the dual benefit of producing cheaper and more robust stoves that can also act as a back-up heating source in the event of a power failure.

Although not explicitly required, a stove without a built-in catalytic converter and electrostatic precipitator is unlikely to meet the emission requirements. All seven known Blue Angel stoves have these features. These additional features are a factor that will make appliances more expensive and increase cleaning and maintenance costs.

3) Benchmark values

There is no information on the origin of the benchmark values. It is also not clear whether they are a consistent and coherent set of values for the same appliance (logs and pellets).

Individual values and characteristics should not be selected from different tests. To be credible, the values shown must come from the same test on the same appliance.

In the current draft regulation, the test methods for wood stoves and the calculation methods for emissions and efficiency have been significantly changed. This raises the question of the basis on which the benchmarks have been set. It is doubtful whether there is a sufficient database of tests using the new test and calculation methods.

Log fuel is variable by nature so single test periods to obtain data are conceptually flawed – replicate measurements are generally required

4) Timeframe

Entry into force on 1 July 2027 is completely unrealistic (assuming the regulation is adopted by mid-2025 at the latest), as all appliances will need to be re-tested according to the new test method. This involves measuring particle number distribution and documenting conformity using a new EU conformity module from Decision 768/2008/EC, which combines modules B and C.

There are currently no Notified Bodies in Europe notified for conformity assessment under this Decision for solid fuel local space heaters. This alone could take up the transitional period of two years.

The ongoing recertification and re-testing of products in accordance with the EN 16510 series is already a major challenge for the entire industry. Re-testing the entire product portfolio to comply with the new Ecodesign Regulation within the proposed timeframe is unreasonable.

This is not only impossible for resource reasons (of the original 45 notified bodies, only 16 have been notified to EN 16510 so far). It is also an unreasonable and unnecessary burden for SMEs who will have to re-develop, re-test and re-certify their entire product portfolio within a period of four to five years.

Sufficient time must be allowed for preparation, including redesign or new development of products and re-testing. A period of five to seven years, i.e. the new regulation will not enter into force until at least six years after its adoption, is a realistic target.

C.E.F.A.C.D is the European Committee of Manufacturers of Domestic Heating and Cooking Appliances with its official seat in Frankfurt but working mainly from Brussels. C.E.F.A.C.D. has been the voice of the industry to EU regulators for over 25 years. In 2017 the organisation was restructured to be more flexible and able to cope with the influx of new legislative initiatives that are approaching us, especially concerning the fast-changing energy market. Membership consists of 4 national associations across Europe, 7 corporate members and several partners. Through these partners C.E.F.A.C.D. is representing over 300 companies, €5 billion in sales volume and over 50.000 people that work with our products in manufacturing installation or servicing.