

***Eurofuel - Overall Comments Relating to the Draft Boilers
Green Public Procurement Documents and Process***

The European Heating Oil Association (Eurofuel) represents the national organisations that promote the use of gasoil and kerosene, as well as bioliquids blends, for domestic heating in 10 European countries, including over 10,000 companies. Eurofuel is engaged in the development of common standards and innovative techniques for heating oil and equipment, primarily in the domestic market. Our members are committed to ensuring the competitiveness and efficiency of heating oil, while reducing its environmental footprint.

Eurofuel, with regard to the ongoing process in developing Green Public Procurement (GPP) criteria for Boilers (and heating systems overall) would like to make the following main observations:

- Welcomes the Commission's work on defining criteria for environmentally-friendly public procurement of boilers, and the EU Sustainable Consumption and Production policy, as a whole.
- Makes these comments as part of Eurofuel's commitment to the most energy efficient and sustainable oil heating (e.g. Eurofuel's involvement in the Consultation Forum for the preparation of eco-design and energy labelling measures for boilers);
- Stresses that GPP criteria for boilers need to be consistent with the approach taken on EPBD recast Directive, EuP (specifically Lots 1, 2 and 15) and Energy Labelling Implementing Measures;
- Also emphasises that GPP criteria for boilers should not be unfeasibly ambitious. Type 1, and EU "Flower", Ecolabels should retain their present role as pushing forward the most ambitious criteria;
- Account should be taken of combinations of heating systems (e.g. oil / solar panels/ micro-CHP) under the GPP criteria for boilers;
- Oil condensing boilers must be included into the scope of the criteria (Eurofuel and its member organisations are very willing to assist the European Commission in providing technical input, as required, to compiling possible GPP criteria).

Please note that additional comments have been made as "Track changes" to the two separate draft GPP documents on Boilers, as submitted by the European Commission for consultation by stakeholders.

Eurofuel looks forward to a continuing constructive discussion with the Commission on GPP for Boilers and Heating Systems, and trusts that the above comments and recommendations are helpful.

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Eurofuel's Members

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Finland: The Finnish Oil and Gas Federation, www.oil-gas.fi

France: Chauffage Fioul, www.chaleurfioul.com

Germany: IWO-Institute for economic oil heating, www.iwo.de

Republic of Ireland: OFTEC (Oil Firing Technical Association), www.oftec.org

Luxembourg: Mazout-info Luxembourg ASBL (M.I.L.), www.mazoutinfo.lu

Norway: Norwegian Petroleum Industry Association (NP), www.np.no

UK: OFTEC (Oil Firing Technical Association), www.oftec.org

Switzerland (Associate Member): Union Pétrolière, www.erdoel.ch

UPEI (Associate Member): Union Pétrolière Européenne Indépendante, www.upei.org