

Brussels, 20th May 2011

Ecodesign & Energy Labelling Directives - Implementing Measures for Boilers (Lot 1) - Eurofuel Position Paper on Revised Working Documents (April 2011)

Eurofuel, the European Heating Oil Association, which represents the national organisations that promote the use of liquid fuels for domestic heating in 10 European countries, including over 10,000 companies, would first like to thank the European Commission's DG Energy for the opportunity to provide further comments on the new set of implementing measures for Ecodesign and Energy Labelling Directives proposed for boilers in April 2011. We appreciate the major improvements achieved in consultation with stakeholders since the previous set of measures, which address a number of concerns expressed earlier by Eurofuel.

However, we would like to highlight a few important issues which the Commission and the Regulatory Committee should address in order to achieve a fair and efficient system, particularly as regards the energy labelling scale (point ii) and the calculation of seasonal space heating efficiency of modulating vs. non-modulating boilers (point iv):

- (i) Eurofuel welcomes the fact that the ecodesign and energy labelling of a boiler will now be defined on the basis of the actual efficiency of the boiler, following a **product approach**.
- (ii) Concerning energy labelling, although the new working documents change the **layout** of the label for fossil fuels, cogeneration boilers and heat pumps, the **labelling scale** remains the same regardless of the energy source (except for low-temperature heat pumps), which is a major concern for Eurofuel. In fact, each energy source would need a **specific labelling scale** (i.e. one labelling system for oil, one for gas, one for electricity-powered products, etc). Energy-by-energy labelling has three main advantages:
 - it is directly related to consumers' bills, and therefore energy savings by purchasing more efficient heating products are more easily understood by consumers;
 - the different energy supply infrastructure types throughout Europe lead to widely-differing evaluations of distinct energy types in terms of relative preferences. Only an energy-specific label ensures transparent energy labelling of Lot 1 ecodesign heating equipment for all European countries;
 - it ensures tight labelling boundaries between similar products, enabling installers and consumers to easily differentiate highest efficiency products.
- (iii) Eurofuel supports a **simplified model** for Lot 1 heating equipment, which assesses heating efficiency on the basis of the product efficiency. Such a model must be capable of being understood and used by wholesalers, heating installers, manufacturers, policy-makers, energy advisers and by interested consumers. Therefore **we welcome** the efforts achieved by DG Energy, in consultation with stakeholders, resulting in the new "**Communication for transitional testing and calculation methods**". The previous complex "EcoBoiler" model proposed by DG Energy's consultant had an

over-complicated, flawed approach and was not fit for purpose. Delays of over three years with the interim “EcoBoiler” model seriously compromised the heating sector’s ability to participate fully in providing solutions to meet Europe’s 2020 energy targets.

- (iv) Despite the major progress achieved with the new Communication, Eurofuel is very much concerned by the factor used in the calculation of the seasonal space heating efficiency for **modulating boilers**, which makes it impossible, even for the best single-stage boilers, to reach energy labelling class A. Eurofuel asks for the deletion of this factor (F(1)), based on the following reasons:
- The impact of intermittent operation or modulation is already considered in the definition of the 30% efficiency degree. Further correction through factor F(1) is thus technically wrong because it is assessed twice.
 - The assessment of boiler efficiency levels at part load does not show any significant differences between intermittent and modulating heating appliances.
 - Modern heating appliances, also without modulation, can achieve high efficiency with very low utilisation ratios.
 - The dimension of the heat generator determines the efficiency of the heating appliance. Modulating the performance only does not automatically result in a more efficient system.

For further details on this point, please refer to our annexed document on assessing the modulation of heating appliances, as well as the report conducted by the Oil Heating Institute (OWI)¹.

- (v) The suggested ecodesign requirements on **NOx emissions** set out in the new working documents (120 mg/kWh) represent a major challenge for the oil heating industry. Extreme technology changes will be needed to adjust the equipment and achieve this very ambitious goal. Therefore Eurofuel would like to stress that any attempts to further reduce this limit would be technologically unfeasible for our industry.

We thank you in advance for considering these concerns when adopting the final set of implementing measures and the accompanying Communication.

For further questions or information on these points, please contact:

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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

¹ Research into efficiency of modulating and intermittent condensing boilers.