



# Position paper

## Comments on ecodesign regulation for local space heaters

Brussels, March 2022

### General

We welcome the initiative to proceed with the revision of the Ecodesign regulation for product lot 20 – local space heaters – discussed during the Consultation Forum held on March 10th. The meeting focused on the availability of spare parts and modularity of these heating appliances, among others.

However, regulations for local space heaters have been experiencing long delays and the last Consultation Forum was held only in 2019. Local space heaters can account for 7.7 TWh energy savings and 1.3Mt CO<sub>2</sub> savings, with 285 million units installed in 2015<sup>1</sup>; their **Ecodesign regulation** (2015/1118) requires therefore meaningful improvements and bold efforts to guarantee such significant energy and carbon emission savings.

We call for the revision of the Ecodesign requirements for such appliances and invite the European Commission to take into consideration the following actions.

### Spare part availability

Concerning the availability of spare parts, we strongly support the Swedish position. Spare parts should be available for the **entire estimated lifetime of products**, including longer lifetimes of portable heaters, often used only a few hours per year, where spare parts can be needed at a later stage.

The **list of spare parts** include:

- Fans – identified as the part that breaks most often in the preparatory study
- Electronic timers
- Displays
- Thermostats
- Switches and buttons
- Wirings
- Plugs
- Remote controls
- Filters
- Outside housing

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<sup>1</sup> <https://www.coolproducts.eu/wp-content/uploads/2021/08/ECOS-EEB-Coolproducts-R2R-position-on-EC-proposal-on-Local-Space-Heaters.pdf>

- Hearing elements
- Nozzles for gas heaters
- Valves for gas and oil heaters

The regulation should foster the possibility for **qualified repairers** to upgrade the controls and deal with the availability of spare parts. In most cases, the repairers do not need to be licensed by the manufacturers or the suppliers, as long as they are qualified to work with electricity or gas. However, for spare parts, where there are no risks involved with installing them in the heater; they should be available to all repairers.

## Modularity and low power mode

Regarding the proposed requirements for modularity, we support **easier and quicker modification** for thermostatic controls, in order to upgrade the functionality of the heater without replacing the heater, allowing to open a market for third-party controls.

We recommend setting **low power mode** as the lowest applicable values. In the case where it could be lower than the horizontal values, we support specific requirements to be set for this product group. Low-power modes should be simplified, and we agree with other stakeholders that the idle mode is not needed. Instead, the stand-by mode should include the state of the heater with thermostat off.

## Final remarks

We urge the Commission to act fast and to organise another Consultation Forum to discuss a full working document for local space heaters as soon as possible.

Moreover, we hope that a proposal for the revision of the **Energy Labelling regulation** (2015/1116) for local space heaters will be available soon.

As we have communicated earlier, **electric heaters** are the least efficient heating appliances, representing the 70% of the product group, and they should surely be included in the scope of energy labelling<sup>2</sup>, so as to enable a fair comparison between all the other local space heaters, including heat pumps.

Furthermore, we appreciate a shorter online Consultation Forum as this one, to involve the stakeholders more often, but we greatly endorse the need of physical Consultation Forum, after a new working document is published.

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<sup>2</sup> <https://www.coolproducts.eu/wp-content/uploads/2021/08/ECOS-EEB-Coolproducts-position-on-the-energy-labelling-of-electric-heaters-final.pdf>