

Zduny, 03.09.2025

**To:
European Commission
Directorate-General for Energy (DG ENER)
Attn. Mr. Bernardo Martinez**

Position of the Polish Association of Fireplaces and Stoves on the revision of Ecodesign requirements for local solid fuel space heaters (COMMISSION REGULATION (EU) 2015/1185 of 24 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council - <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R1185>) hereinafter referred to as "Ecodesign".

After reading the assumptions of the Ecodesign revision and the presentation of DG ENER of June 25, 2025, we have the impression that the EC wants to completely eliminate these devices from the market and at the same time wants to completely exclude the possibility of using logged wood as fuel in the municipal and domestic sector (individual heating).

The proposed changes have no technical justification or research support.

1. No assessment of the effectiveness of the current Ecodesign regulations for solid fuel LSH has been carried out. However, this is not possible because the Ecodesign came into force only on January 1, 2022 and only for newly installed devices. Assessment of the effectiveness of the first Ecodesign is a necessary condition for its changes. In our opinion, it is much too early to work on revising the Ecodesign, because three years after its entry into force for newly installed devices, it is impossible to assess the effectiveness of these regulations, let alone tighten them.

2. The documentation accompanying the planned changes has glaring deficiencies.

- There is no information about the sources of the presented emission factors in real conditions (other complementary sources - page 18 presented by: <https://circabc.europa.eu/ui/group/418195ae-4919-45fa-a959-3b695c9aab28/library/60e648ee-0722-4740-9020-bbb80e3ada79/details>) which makes it impossible to comment and verify this data.

- There is no analysis and technical justification of all proposed changes based on LSH studies that meet the Ecodesign requirements (EC Regulation 2015/1185) in real conditions.
- There are no tests of all proposed peripheral devices (filters, catalysts and controllers) in real conditions in cooperation with local space heaters that meet the Ecodesign requirements and with verification of the declared efficiencies. Does the European Commission have documentation confirming the long-term operation of peripheral devices installed at the LSH in real conditions with the declared efficiency? We request access to such documents.
- There is no analysis of reducing the consumption of fossil fuels (gas and coal) while increasing the share of renewable energy sources (wood and other types of biomass).
- Lack of analysis of the reduction in heating costs of households using wood-burning Ecodesign devices and the economic benefits for local communities resulting from obtaining, processing and using wood (RES) for heating purposes as part of the circular economy.
- Lack of analysis of the social, economic and health costs of eliminating LSH from the market, where each added value should be considered in the context of costs incurred in other fields, because it may turn out that the benefits obtained in one field will be exceeded by losses in other fields, which is in opposition to the principles of sustainable development - EU taxonomy.
- Lack of coherence assessment, which should take into account EU regulations on renewable energy sources, in particular wood, and scientific knowledge on renewable energy sources and carbon footprint.

3. The initiative does not take into account the specificity of individual countries and regions at all. In the countries of northern, central and eastern Europe and in regions located higher above sea level, local heaters function as alternative but very important devices, because they save life and health in the event of a failure of the main source or interruptions in the supply of energy by large transmission networks (electricity, gas). In warmer regions with a Mediterranean climate, local space heaters can successfully serve as the main and only source of heat throughout the heating season, but you could just as easily do without them for most of the year. However, also in these regions, situations cannot be ruled out where human health or life may depend on the presence of a local wood heater.

4. In any possible work on revising the Ecodesign, fossil solid fuels (coal) should first be separated from renewable solid fuels (wood and pellets). Combining wood with coal in the group of "solid fuels" will lead

to bans on using it as an energy source. Wood is a renewable energy source and any bans on its use as fuel are anti-ecological and inconsistent with the EU's climate policy.

5. Poland is a country with the world's strictest regulations limiting or prohibiting the use of local wood heaters, including local heaters that meet the Ecodesign requirements. Because all of these bans were based on incorrect forecasts or manipulated or even falsified data, the improvement in air quality after their entry into force is much smaller than expected. This is due to the fact that local wood air heaters have a minimal share in the total air pollution and the causes of the problem should be sought elsewhere. Our experience shows that bans or regulations that tighten the emission requirements of devices have a smaller impact on emissions. Education on proper combustion is much more important, even fundamental. This applies to both the preparation of wood (seasoning) and the process of lighting and burning in local space heaters. Practice has shown that emissions can be significantly reduced by intensifying educational activities. Examples of correct educational policy in this area are Germany, Austria and Switzerland.

6. Wood-burning local space heaters have several significant advantages:

- These are devices that, in most cases, act as an additional, emergency and alternative heat source. They are only occasionally used as the main heat source.
- These devices always work, regardless of failures of large energy networks: electricity and gas.
- Wood is a renewable energy source.
- Wood-based LSH are a model example of devices that perfectly fit into the circular economy.
- They are mostly made of basic raw materials, easily available at the place of production and easy to process, such as steel, cast iron and heat-resistant ceramics.
- They do not contain hazardous substances and materials that would be difficult to process or require special neutralization processes.
- They are characterized by a long service life without any decline in technical parameters and functional properties.
- They are often used for generations.
- Wood and local wood-burning space heaters have the smallest carbon footprint of all heat-generating devices.

We request the suspension of work on the revision of the Ecodesign for the LSH for an indefinite period.

OSKP firmly opposes any bans and restrictions on wood heating, especially in installations intended exclusively for the use of biomass. Bans on the use of wood as fuel in our climate zone, which is often passed over in silence, result in an increase in the consumption of gas, which is a fossil fuel, expensive and mostly imported. Introducing energy efficiency thresholds or emission limits that are too ambitious or impossible to meet will effectively limit the use of local wood space heaters and wood itself as fuel. This, in turn, will lead to a decrease in the energy security of residents and an increase in energy poverty.

Heating needs in European Union countries vary due to geographical and climatic reasons. The heating season in southern and even western European countries is much shorter than in eastern, central and northern European countries. National, regional and local energy sources in European Union countries are also diverse. This applies to irreproducible resources of fossil fuels (coal, crude oil, natural gas) as well as the use of renewable energy sources (wind, solar, geothermal, water and biomass). The energy security of each European Union country should take into account the above differences in heating needs and the availability of national, regional and local energy sources, especially renewable energy sources in current activities to decarbonize the energy industry. It is also necessary to take into account energy poverty, which occurs to a greater or lesser extent in every European Union country.

The operation of LSH powered by solid biofuel, available locally and meeting the requirements of the Ecodesign, is an opportunity to cover 100% of local heating needs and an emergency method of heating rooms in critical situations (e.g. failure of the electricity supply system).

The fundamental questions are: What will be the real effect of tightening the Ecodesign requirements and will the originators of the initiative take responsibility for human life and health exposed by limiting access to wood and local wood heaters?

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