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***Eurofuel's comments regarding the EU Ecolabel and GPP criteria for
"Hydronic Central Heating Generators"***

Eurofuel, the European Heating Oil Association, represents national organisations that promote the use of liquid fuels for domestic heating in 10 European countries and over 10,000 companies. Eurofuel has long been involved in consultations with the European Commission and other stakeholders on regulatory issues of relevance to the heating sector, in particular in the framework of ecodesign and energy labelling measures for boilers.

We are now also following the Commission's ecolabel and green public procurement (GPP) policy with great interest, as these initiatives may have a substantial impact on our industry. In this paper, Eurofuel would like to submit comments on issues of major concern with the **draft ecological criteria** and the draft report on the "**Development of European Ecolabel and Green Public Procurement Criteria for Hydronic Central Heating Generators**".

The following comments are based on the outcome of the 2nd Ecolabel Workshop (AHWG) held in Brussels on 29 November 2011 and the Workshop for the development of Criteria under the European Commission's GPP Scheme on 17 January 2012.

Eurofuel would like to express serious concerns about the fact that the draft criteria as they stand would prevent oil boilers from obtaining an Ecolabel, based on the following arguments:

- Oil boilers are considered in the supporting policy analysis ("Development of European Ecolabel and Green Public Procurement Criteria for Hydronic Central Heating Generators").
- Oil is a major energy source for heating in Europe. As highlighted in the policy analysis, around 15.8 million oil boilers are in operation, covering 14 % of the European heat demand in houses.
- Highly efficient oil condensing boilers are already available now. Boiler manufacturers are also developing new, even more efficient oil systems such as oil-driven heat pumps or micro CHP.
- Many oil boilers already incorporate renewable sources of energy through solar thermal or bio-oil. In some European countries oil boilers are more often combined with solar thermal systems than any other heating system. Several other concepts for hybrid solutions are available such as combinations of oil boilers with wood pellets, heat pumps or electricity.
- Heating oil provides an optimal long-term energy storage solution, both from a cost and energy density perspective. Therefore variations in the availability of renewable energies like sun or wind will not result in a shortage of energy at any time, owing to the base load available via the stored heating oil.

- Oil boilers are often used in rural areas where consumers are not connected to a gas grid and only have limited opportunities to switch over to other energy sources.
- In the future, the Ecolabel should be able to help consumers to select the best available oil-driven technology.

Based on the abovementioned arguments, Eurofuel questions the approach taken in the draft criteria and calls upon the Commission to make oil heating systems eligible to the Ecolabel scheme.

Eurofuel would also like to make the following comments:

- Consistency in regulations is an absolute necessity. EU Ecolabel and GPP criteria should comply with the approach taken in the Ecodesign implementing measures (EuP/ErP LOT 1 in particular). Ecolabel and GPP criteria should only take into account criteria for specific standardised measurements.
- The criteria used for granting the EU Ecolabel and the GPP criteria should be the basis to allow for the distinction of heat generating types within one product group for a specific energy source (e.g. oil condensing boilers).
 - The Ecolabel should be awarded for the top x% of the best rated products. This labelling should apply to different types of products (gas fired boilers, oil fired boilers, heat pumps, mCHP...). It is actually important to stress that consumers do not necessarily have the choice between different energy sources (e.g. when they have no access to the gas network) or have a restricted choice due to budget constraints, especially in times of economic crisis.
- Eurofuel strongly recommends the introduction of product and energy-specific evaluation criteria.
 - The common benchmark approach on the parameters for all types of heating generator technology, energy efficiency and greenhouse gas (GHG) emissions cannot be accepted. The proposed limits should be achievable for the best boilers and for each energy source mentioned in the scope of the Ecolabel scheme. The proposal already includes specific limits for specific technologies. For wood boilers higher limits for particle emissions, NOx emissions, CO emissions are included to ensure that this kind of boilers will be eligible to the Ecolabel.
- Criterion 1 – Minimum energy efficiency
 - Eurofuel cannot agree on a value of 90% efficiency. Results should actually depend on the final calculation model adopted under Ecodesign measures (EuP/ErP LOT 1).
- Criterion 2 – Greenhouse gas emissions limit
 - Eurofuel proposes an adapted GHG limit of 320 mg/kWh for liquid fuel boilers. Any lower limit would prevent oil boilers from obtaining an Ecolabel. The proposal already includes specific requirements for core criteria. For wood boilers the measurement procedure has been adapted, to ensure that the minimum efficiency set in the Ecolabel can be achieved.
- Criterion 4 – Nitrogen oxides (NOx) emissions limit
 - In compliance with the approach and standard taken in the Ecodesign implementing measures (EuP/ErP LOT 1), Eurofuel proposes an adaption of the NOx limit to 100 mg/kWh of heat input for liquid fuel boilers.
- Criterion 6 – Carbon monoxide (CO) emissions limit
 - NOx and CO are factors linked one to another. Optimising performance in order to achieve low NOx emissions causes CO emissions rising to significantly high values. Therefore Eurofuel proposes to adapt the CO limit to 50 mg/kWh of energy input.
- Criterion 7 – Particulate matter (PM) emissions limit
 - Eurofuel proposes the adaptation the PM limit to 5 mg/m_{N3} for Cogeneration, for internal combustion engines using liquid fuels.

We thank you for taking our comments into account in the further work on Ecolabel and GPP criteria and look forward to continuing a good cooperation on this issue in the future.

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

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