

## **Minutes of stakeholder meeting for review study for local space heaters**

Charlemagne building, Room Sicco Marsholt, 22<sup>nd</sup> June 2018 (10.00 – 17.00)

**Orsola Mautone (OM)**, from the European Commission: The policy officer welcomed stakeholders and informed about the purpose of the review study and briefly about the first stakeholder meeting for 3<sup>rd</sup> party certification.

**Mette Rames (MR)**, from Viegand Maagøe: the project manager of the study team welcomed the participants and introduced the agenda of the day, the timeline of the project and presented the study team.

### **On Task 1:**

**MR and Peter Skov Hansen (PSH)** presented task 1.

### **Questions & Answers on Task 1: on scope and definitions**

**Ecos** questioned whether the study team will update the minimum requirements.

**MR** stated that we will investigate this, but the study team have no immediate recommendations on minimum requirements.

**Barbas Bellfires BV** questioned the current definitions and whether the closed fronted category cover the two completely different categories: Closed fronted heaters and decorative heaters? The first is usually used for primary heating, are cheap, and have no visible flame, but only emits direct, radiant heat. The decorative heaters are luxurious products used for secondary heating. Is it possible to do a split between these two products groups?

**MR** replied that it is possible if there is a technical difference that makes it possible to distinguish the two categories in the regulation, but there should be a reason to do so. Is it because of differences in efficiency, which requires the two products to have different Ecodesign requirement levels? If we should do this split, we need sufficient data.

**Barbas Bellfires BV** stated that they will supply the required data.

**ELVHIS** raised several points for discussion:

1. If the term “Human Thermal Comfort” is removed, not only agricultural but also some types of industrial heaters need to be exempted specifically.
2. The term “useful efficiency” is not in line with Energy Performance of Buildings Directive (EPBD) standard

**MR** replied that if we move forward with the re-definition regarding the Human Thermal Comfort, we will take this into account. The term “useful efficiency” was introduced in the boiler regulation and is also used in other heating product regulations, and this common terminology across regulations should be taken into account before changing it in this one. Also, the term is related to the calculations, where it is assumed that the heat wasted (when product produces not-useful heat) is equal to a decrease in efficiency (i.e. the 10%-points subtracted in the calculations).

**ECOS** had a remark on the scope. They would like outdoor heaters to be included in the scope (both gas and electric) and towel heaters, even though they do not have a fan or similar, they should be included. So, a request to the study team is to investigate how the regulation could cover these products.

**MR** replied that the study team will look into it, but it also depends on the possible changes to the local space heater definition and on the ability to obtain data on these product groups.

**EUHA** raised a question about underfloor heating devices sold without a control, which as a result of the definitions of electric underfloor heating and of slave heaters, are not covered in the regulation, whereas the combined packages (mats + controllers) are covered, which creates a big difference in the two product types on the market. Clarifications should be made in the Regulation so that all underfloor heating products are included in the scope. Even when underfloor heaters are sold without a control, the products will always be combined with a control during the installation. The solution is not to require all products to be sold with a thermostat, since this would result in a lot of thermostats not being used, as you can still combine the heating wire with another control (i.e. it would go against the goal of better resource efficiency).

Instead, the regulation should cover the controls. However, many different types of controls exist that can be used for underfloor heating devices, and it is difficult to define them. But in principle, the control needs to be compliant with the Ecodesign requirements, i.e. have the required functions, not just the heating device itself.

**MR** stated that the study team will look further into this issue with slave heaters, to avoid these differences in the market and to avoid loopholes.

**EHI** commented on the discussion on slave heaters and suggested that the regulation should apply to the whole system, as mentioned for the underfloor heaters. Furthermore, information should be given to the consumer about which control the product is compatible with and which functions this control should have.

**LCIE** raised the question on towel heaters, since a towel heater and a combined towel/room heater can both have the same electric power, but only one of them is covered by the regulation, e.g. some manufacturers have removed the thermostat from their products to be able to sell them outside the scope of the regulation, nevertheless that the heaters have input of 1000 W. Such large heaters will still provide some heat to the room, even though they are not sold as room heaters. To avoid this, the regulation should cover all towel heater products.

**EHI** added a comment on the towel heater discussion and supported the idea of having a temperature probe in the overall definition and perhaps also add a limit to define which towel heaters should be included, e.g. at 250 W. Also, EHI had the following points:

1. That mixed radiators exist, which are both hydronic and electric. They would provide data to the study team
2. EHI asked for clarity for underfloor heaters

**Department of Business, Energy and Industrial Strategy (UK)** stated that if smart controls (or controls in general) are included in the scope, you need to define what a smart system and what is a smart control.

This is necessary if you want to include slave heaters in the regulation. The UK is investing heavily in smart systems.

**ADAX** suggested to simply include the thermostats that control the products in the regulation, i.e. requirements for thermostats to have the different control options mentioned in the correction factors to avoid any loopholes.

**Eurovent Association** commented on the presentation and stated that overdoor heaters and air curtains are very different products and that air curtains should be included in the scope, while overdoor heaters should not. They would provide further details to the study team.

**CEFACD** suggested to remove decorative fires from the regulation and review the different categories for gas and liquid heaters as these categories are outdated and entirely new categories are suggested.

**Groupe Atlantic** stated that the word “radiant” in the definition is confusing since, e.g. panel heaters emit radiant heat. Panel heaters should be included as a separate category in the study, and another word should be found for the current “radiant” category.

**nVent** suggested to look at the controls, so the minimum requirements not are given for combined heater+controls but instead shift the requirements to thermostats and controls. They also suggested to revisit the elements that are considered “efficient” (i.e. the bonuses). Not only presence, open window detection etc. have a positive impact on the efficiency, but also other elements.

**Adax** suggested changing the title of the regulation to “local space heaters and controls”

**Jan Viegand (JV)** stated that care should be taken not to create any other/new loopholes in the regulation.

**OM** stated that the inputs on underfloor heating were appreciated as this is currently one of the best examples of the slave heater loophole in the regulation.

### **Questions & Answers on Task 1: on calculations**

**ECOS** asked if the study team would consider how “correct” the bonus factors are?

**MR** replied that the study team will consider the bonus factors to the extent that we get new information, but it is not something that we can obtain data for, since it depends on user behaviour, and would require studies about the use stage. Furthermore, MR stated that the factors are based on political consensus.

**EHI** questioned the correction factor  $F(2)$  and wondered why this is 6% for portable heaters when it is only 1% for fixed? Even though the two products are essentially the same.

**De’longhi** replied that this was based on the use pattern for the different products, and the way the portable is used compared to the fixed heaters, since fixed heaters are used for primary heating, whereas portable heaters are used for secondary heating (i.e. turned on for short periods of time to boost the heat).

**MR** stated that it could be useful to see data that supports that portable is used differently than fixed heaters since it is difficult to find solid data because heaters are used differently depending on the climate.

**ECOS** asked whether the study team would include considerations of how the new PEF factor would affect the regulation and the requirements.

**OM** stated that the study team will adapt the PEF factor to this regulation and all regulations which are reviewed in the future as the PEF factor is not directly applicable for all regulations. I.e. the local space heater regulation does not refer to the energy efficiency directive for the PEF value, but the current 2,5 is written directly in the regulation. The new PEF can therefore only be implemented through the revision of the regulation. The same is the case for all other regulations that use the PEF value.

----- Break-----

**MR** and **PSH** presented task 2

### **Questions & Answers on Task 2**

**Netherlands Enterprise Agency** stated that forecasting sales for 2050 entails very high uncertainty, and it is too far in the future for this analysis. This is true for many product groups, but sales of local space heaters are particularly difficult to forecast, since many countries are pushing for fewer fossil fuels, e.g. in the Netherlands, there is a goal to be “gas free” by 2030. This will seriously affect the sales and stock of various products and will even cause products to go obsolete on a day to day basis because of changes in infrastructure. The electric heating is also competing with central heating/district heating and heat pumps, and it can generally be assumed that sales will go down for the electrical products. Netherlands Enterprise Agency suggested to look only at the immediate future (i.e. in 2030) or to investigate models (forecast of the future energy supply) from EU on how the energy mix is expected to develop in the future.

**PSH** replied that the sales and stock are very difficult to determine, but due to the long lifetime of the heaters we need to look beyond 2030 to see the full impact of any requirements.

**ELVHIS** commented on the sales and stock for liquid luminous heaters and stated that there is no such thing as liquid luminous heaters (i.e. the technology does not exist), and the tube heaters are rarely with liquid fuels. Regarding market trends ELVHIS suggested to divide the gas and liquid heaters into commercial and domestic heaters to make market trends clearer, i.e. the shift away from gas for domestic products are not likely to happen for commercial products. Also consider that other types of gas might be used, e.g. biogas.

**PSH** asked about the technical reasoning for the statement of liquid luminous heaters

**ELVHIS** replied that they will send some technical information.

**CEFACD** questioned the origin and age of the data on sales since the data seemed old and suggested falling sales rather than increasing, as shown in the report. CEFACD stated that they could provide updated data.

**PSH** replied that the data is based on the preparatory study, the impact assessment and discussion with stakeholders. The data is subject to change based on inputs from stakeholders, so any new data will be helpful.

**Glen Dimplex** commented on the discussion and stated the sales for flueless heaters were too high and they would provide sales data for these heaters.

**Norwegian Water Resource** commented on a figure/map in the report and requested to include Norway in the figure/map.

**MR** replied that the figure originated from a stakeholder, but the study team will find a way to include Norway.

-----Lunch Break-----

**MR** and **PSH** presented the primary findings of task 3

### **Questions&Answers on Task 3**

**EHI** commented on the 3<sup>rd</sup> party certification and suggested that the headline should be “3<sup>rd</sup> party conformity assessment”, and verification and certification are then options for this.

**Belgian Ministry of Environment - Product policy** stated that they are in favour of 3<sup>rd</sup> party conformity assessment when there is a high impact from the products. Currently, Market surveillance authorities (MSA) struggles to do sufficient testing. 3<sup>rd</sup> party could ease the workload of MSAs and ensure a more level playing field since no one could circumvent the rules on purpose, as it was found for solid fuel local space heaters in Belgium.

**EHI** stated that an important element of the decision is that the burden cannot be too high compared to the risk.

**Department of Business, Energy and Industrial Strategy** asked how the study team would calculate the energy consumption? Which temperatures are used at the consumers?

**Belgian Ministry of Environment - Product policy** added that the insulation of buildings also would influence the energy consumption and the size of the heaters may be reduced and asked whether the study team could include these considerations?

**MR** replied that these considerations would be included if sufficient data is available.

**MR** and **PSH** presented Task 4

### **Questions & Answers on Task 4**

**Belgian Ministry of Environment - Product policy** stated that local space heaters probably have a very limited content of critical raw materials, but some manufacturers might use some alloys with critical raw materials. They suggested instead to look at the repairability and spare parts.

**OM** reminded that following the recent support that the Commission has expressed toward a Circular Economy, the review should investigate and present requirements on resource efficiency.

**Belgian Ministry of Environment - Product policy** commented on the tolerances and stated that decent labs could make very accurate testing with low uncertainty. The tolerances can be reduced in the regulation and gas appliances in other regulations have lower tolerances.

**ELVHIS** asked if product families could be tested instead of individual products? In the case of 3<sup>rd</sup> party certification, it needs to be specified exactly which and how many products need to be tested. E.g. in

industrial heaters there is a series of similar products of different sizes, and when self-declaration is applied (as today) this is not a problem, but the regulation is not clear if each size needs to be tested in case of 3<sup>rd</sup> party conformity assessment.

**Belgian Ministry of Environment - Product policy** replied that equivalent models could be used but not product families.

### **Conclusions and next steps**

The meeting was concluded with practical information about the study:

- When commenting the report, please use the comment form, which can be found on the study website: <https://www.eco-localspaceheaters.eu/documents>  
Please send the comments to [mra@viegandmaagoe.dk](mailto:mra@viegandmaagoe.dk) **3. Of August 2018** at the latest
- Meeting minutes from today's meeting will be uploaded on the study website ASAP (probably within 1-2 weeks, and e-mail will be sent out)
- A revised version of the interim report (Task 1+2) will be uploaded on the study website in the beginning of September (an e-mail will be sent out)
- The draft final report will be ready in winter 2018 and will include all 7 tasks from the MEERp method (i.e. the full study). Inputs and comments are very welcome during the time from now until November!
- The second stakeholder will most likely be in week 6 of 2019 (February)

## Attendance list

Organisation represented	Name-Last	Name-First
Agoria	van de Water	Charlotte
APPLiA	Xhonneux	Alain
Applia - De'Longhi Appliance	Vit	Stefano
APPLiA - Europe	Rambaldi	Matteo
APPLiA / ZEHNDER	Cordier	Vincent
APPLiA/ De' Longhi Appliances	Aloisi	Alberto
APPLIA/GROUPE ATLANTIC	de Torquat	Luc
Applia/Groupe Atlantic	Devines	Yann
APPLiA/Muller Group	Gajic	Mara Missouri
Assobagno, Italy	Lumassi	Alessandro
Barbas Bellfires BV	Peters	Jan
Barbas Bellfires BV	Smit	Eric
BE Ministry of Environment - Product policy	Soenen	Bram
BEAMA	Regueira-Lopez	Adrian
BEUC/ANEC	Maigret	Aline
C.E.F.A.C.D.	Heijnk	Dominik
CEFACD	Gelten	Marinus
Department for Business Energy and Industrial Strategy	Barker	Adrian
Department for Business Energy and Industrial Strategy	Taylor	Marvin
DRU Verwarming B.V.	Zantinge	Raymond
ECOS	Fayole	Chloé
EHl - European Heating industry	Rateau	Fanny
EHl / Rettig ICC	Adlercreutz	Rickard
ELVHIS	Weber	Konrad
EUHA	Kolb	Stephan
EUHA - Electric Underfloor Heating Alliance	Corbin	Arthur
Eurovent Association	Scuderi	Francesco
Federal Institute for Materials Research and Testing (Germany)	Wachau	Andre
GAS.BE - Testing house	Thibaut	Olivier
Gazco Ltd	Kingscott	Ian
GIFAM	Le Devehat	Patrick
Glen Dimplex	Byrne	William
Glen Dimplex Group	McDonald	Alan
HHIC	Pope	Robert
HKI Industrieverband e. V.	Kienle	Frank
HKI Industrieverband e. V.	Radacki	Dominika
INFORSE-Europe and ECOS	Olesen	Gunnar Boye
LCIE	Le Gall	Janig
Marcogaz	Carpentier	Stéphane
Marsan industrial s.a. Haverland	Marquez	Joaquin
Marsan industrial s.a. Haverland	Molina	Fernando
Ministry of the Environment (Finland)	Kalliomäki	Pekka

Netherlands Enterprise Agency	Siderius	Hans-Paul
ADAX	Sandum	Steinar
Norwegian Water Resources	Bohagen	Knut Egil
Norwegian Water Resources	Fagerlund	Kirsti Hind
nVent (member of the EUHA)	Hendrickx	Patrick
SPF santé publique, sécurité de la chaîne alimentaire et environnement	Vercouter	Estelle
Stiebel Eltron GmbH & Co. KG [also CENELEC TC 59X WG12]	Eiler	Walter
Trade Association - HEATING AND HOTWATER INDUSTRY COUNCIL	Sutton	STEVEN
Vaillant Group	Wall	Wilhelm
Viegand Maagøe A/S	Hansen	Peter Martin Skov
Viegand Maagøe A/S	Rames	Mette
Viegand Maagøe A/S	Viegand	Jan