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## Joint Position Paper on Revision of European Commission Regulations (EU) 813/2013 and (EU) 811/2013 on respectively Ecodesign and Energy Label of central hydronic space and combination heaters

The signatories – ECFD (European Confederation of Fuel Distributors), Eurofuel (European Liquid Heating Fuels Association), FuelsEurope (European Fuel Manufacturers Association) and UPEI (The Voice of Europe's Independent Fuel Suppliers) – appreciate the efforts of the European Commission in pursuing the decarbonisation of the heating sector through the revision of the ecodesign and energy labelling requirements for space heaters. Our sectors are committed to promoting the competitiveness, efficiency, and environmental sustainability of heating with low carbon and renewable liquid fuels. For these reasons, we express our concerns and recommendations regarding the proposed revision of the Regulations.

While we recognise the need to improve the efficiency requirements of heating appliances in line with the technological progress in order to decarbonise the residential heating sector, we believe that the proposed phase out of 'stand-alone' (non-hybrid) boilers from September 2029 could have several unintended consequences for end-users, manufacturers as well as the underlining climate objectives. In our efforts to achieve our climate goals in a technology neutral manner, we should not undermine social justice and security of supply.

We would first underline that we generally support the position that the European Heating Industry (EHI) has submitted<sup>1</sup>, in particular we endorse the following aspects:

- It is key that the new Ecodesign framework supports **all solutions that are both efficient and renewable-based**, giving **end-users the possibility to choose** the most efficient product according to the type of buildings they are living in as well as their financial capabilities.
- A positive approach would be to **allow all appliances certified to run with any renewable energy** to be placed on the market, in line with the European Parliament position on the Energy Performance of Building Directive<sup>2</sup> and the conclusion of the EU's 2050 long-term strategy, acknowledging that **renewable fuels** will play a role to decarbonise heating alongside renewable electricity.
- The **minimum energy efficiency requirement at 115% will ban spare part fuel boilers** also for hybrid heat pumps. It should be possible to put a boiler as a stand-alone product on the market when this product will replace a boiler already associated with an existing heat pump, e.g. a so called add-on, benefitting from energy efficiency improvement with that change.
- There are situations where no other solutions can be installed than a boiler, and exemptions should be granted.
- An energy label that maximises the potential of incentives, considers the decarbonisation of energy carriers and smart appliances.

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<sup>1</sup> At both meetings of the Consultation Forum on 27 April and 12 June 2023.

<sup>2</sup> Amendments [adopted](#) by the European Parliament on 14 March 2023 on the proposal for a directive of the European Parliament and of the Council on the energy performance of buildings (recast)

We would add, to elaborate on some of these points:

- In our view, the current proposal appears to discriminate against certain appliances and does not provide manufacturers with guarantees that boilers using renewable and low-carbon liquid fuels can be used. Low carbon and renewable liquid fuels are a valuable and already proven solution and should not be subject to what is deemed as hidden bans. Moreover, we urge the European Commission to reconsider the proposal in light of the **technology neutrality principle**, as recently reaffirmed by the European Parliament in their negotiating position on the Energy Performance of Buildings Directive (EPBD).
- The proposed pace of transition may have unintended consequences for users, who typically replace boilers when they break down. **The rapid ban of replacement boilers by 2029 could impede progress on decarbonisation and energy efficiency gains**, as users may opt to keep their old boilers for as long as possible instead of transitioning towards more expensive alternatives such as hybrid systems. We therefore recommend setting the minimum seasonal space heating energy efficiency at 95 % for those heaters that are certified to run on renewable fuels. This would encourage a shift towards the most efficient condensing boilers, thus significantly reducing energy consumption.
- In line with the subsidiarity principle and with article 194 of the TFUE, **Member States should be able to decide their own energy mix**. The current provisions of the Regulation, by banning specific technologies, leave little room for flexibility in the decarbonisation pathway.
- In addition, the Commission should acknowledge the challenges that grid operators and regulators will face due to the energy transition in transportation and buildings. The proposed rules and timelines may exacerbate these challenges, especially during peak times. Therefore, we **recommend a more gradual transition** that safeguards end-users, industry, and grid capacity.

In conclusion, we support the European Commission's ambitions to decarbonise the heating sector through the revision of ecodesign and energy labelling requirements. However, we believe that **adjustments to the proposal are necessary** to ensure a more **flexible and technology-neutral approach**, aligned with the subsidiarity principle and the interests of end-users, manufacturers, and grid operators.

We look forward to engaging in constructive dialogue with the European Commission and other stakeholders to shape a regulation that promotes a sustainable and efficient heating sector for all.

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