

Energy efficiency – ecodesign requirements for solid-fuel boilers (review)

Bioenergy association of Finland would like to submit the following inputs concerning the revision of Ecodesign requirements for Solid-fuel Boilers.

Solid fuel boilers are proven technologies that have shown significant improvements in energy efficiency through the years, using less feedstock and therefore reducing emissions. In this context, stricter efficiency requirements will not promote better air quality but rather hinder the replacement of systems already active in the market. The European heating stock is quite old and polluting. Replacing old logwood boilers with modern wood heating systems would drastically reduce fine dust emissions up to 85% (or even 99 % reduction if the best available technologies are used) and lower wood consumption by 40%. Modern biomass solid fuel boilers work with extremely staged combustion and hardly cause any fine dust emissions even without filters. This shows that filters will become superfluous in the future. Making wood boilers more expensive through excessive regulations will make people buy more gas and oil boilers.

A strong plan to retrofit and replace old appliances with new modern ones would achieve a sharp reduction in PM emissions. A programme to support this change combined with training of the users and promotion of certified fuel would directly contribute to a better air quality. In parallel substituting fossil fuel boilers with new biomass boilers would contribute to climate and energy security targets.

The heating sector in Europe has a highly heterogeneous building and ownership structure. Therefore, the necessary high level of ambition for renewable heat supply makes it imperative to grant building owners as much technical and economic freedom as possible and to provide the widest possible range of options for climate-neutral building heating. This allows them to choose the defossilisation option that best suits their specific needs or those of their tenants.

The bioenergy sector supports energy efficiency labels as a tool to make it easier for consumers to identify products that meet their expectations. However, this requires a clear distinction between quality of products, as well as defined product ranges that have a common technological basis. This is not the case with the planned merger of the labels for heat pumps and solid fuel boilers. The combination of different technologies in one energy efficiency label means that it is no longer possible to differentiate between the product groups involved. This way, the label, which is actually intended to make purchasing decisions easier for consumers would be counterproductive.

The proposed abolition of the biomass label factor (BLF) would reinforce this effect. Biomass boilers strongly contribute to the EU security of supply and energy independence, while transitioning away from fossil energy. To ensure a proper comparison between fossil and renewable energy the BLF, or alternatively a renewable factor, should therefore be retained. Biomass is indispensable in the heating market and a fully renewable and secure heating system without biomass is inconceivable.

Finally, solid fuels boilers are incomparable with heat pumps as they serve distinct functions and use different energy source. Merging these two products in a single label would decrease the granularity of information and hamper the ability of consumers to make informed purchasing decisions. A single label would fail to adequately consider important factors, such as the impact of seasonal variations of Heat Pumps and the seasonal efficiency of electricity generation.

For all these reasons the Bioenergy Association of Finland is strongly opposing the deletion of the BLF and the merger of labels.