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# Purpose of the guidelines and disclaimer

The ecodesign and energy labelling regulations for local space heaters were published in 2015. These regulations establish minimum requirements and an energy labelling scheme for the products in their scope. These guidelines aim to help relevant stakeholders, including industry and public authorities, to implement the regulations in practice. They summarise the most relevant information from the regulations to give SMEs an introduction to the subject matter and answer the most common questions.

The guidelines are intended to be used only for facilitating the implementation of the Regulations. They are not intended to replace the Regulations or to provide "interpretation" beyond their intent. The guidelines only reflect the opinion of the Commission services and are not legally binding. A finally binding interpretation of EU legislation may only be provided by the European Court of Justice.

# *The Regulations*

The European Union has adopted following regulations concerning local space heaters:

* Commission Delegated Regulation (EU) 2015/1186 of 24 April 2015 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regards to the energy labelling of local space heaters[[1]](#footnote-1);
* Commission Regulation (EU) 2015/1188 of 28 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regards to ecodesign requirements for local space heaters[[2]](#footnote-2);
* Commission Regulation (EU) 2015/1185 of 24 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regards to ecodesign requirements for solid fuel local space heaters[[3]](#footnote-3).

# Scope

Ecodesign regulation (EU) 2015/1188 covers local space heaters, with the exception of solid fuel local space heaters, with a nominal heat output up to 120kW. Solid fuel local space heaters with a nominal heat output up to 50 kW are covered by Ecodesign regulation (EU) 2015/1185. The Energy Labelling Regulation (EU) 2015/1186 covers local space heaters with a nominal heat output up to 50kW, including solid fuel local space heaters, but excluding electric, luminous and tube local space heaters.

The heaters covered by the Regulations can be classified as follows:

* Gaseous fuel local space heaters
* Liquid fuel local space heaters
* Electric space heaters
* Solid fuel local space heaters
* Solid fuel cookers

# Product environmental impacts

The preparatory study[[4]](#footnote-4) identified and analysed the relevant environmental impacts of local space heaters. The use phase of the products has been clearly identified as the most important phase in terms of both environmental impacts and having the most potential for improvement. Therefore, no specific requirements considering production or transport were proposed and the regulatory measure focuses on the use phase and, for ecodesign, also on the end-of life-phase.

As for most products subject to ecodesign regulations, the primary energy consumption during the use phase constitutes the main environmental impact via the related carbon dioxide emissions.

Emissions from the combustion of fuel (e.g. NOx, particulate matter, organic gaseous compounds and carbon monoxide) are also relevant for the local space heaters with a burner. Electric local space heaters do not directly produce emissions of this kind.

# State of play of legislation

# *History of the product legislations to date*

From the start of the preparatory study in 2011 until the publication of the implementing measures in 2015, the process lasted 4 years.

# *Time table*

* 21/07/2015: Publication
* 10/08/2015: Entry into force
* 01/01/2018: Tier 1 requirements for local space heaters, excluding solid fuel local

space heaters on energy efficiency and NOx

Energy labelling with a scale from A++ to G for all local space heaters except flueless heaters or open to chimney heaters using solid fuels

* 22/08/2018: Special revision on 3rd party certification for solid fuel local space

Heaters ((EU) 2015/1185)

* 01/01/2019: Revision ecodesign requirements for local space heaters, excluding

solid fuel local space heaters ((EU) 2015/1188)

* 01/01/2022: Tier 1 requirements for solid fuel local space heaters space heaters on

energy efficiency, NOx, particulate matter (PM), carbon monoxide (CO) and organic gaseous compounds (OGC)

Energy labelling with a scale from A++ to G for flueless heaters and open to chimney heaters using solid fuels

End of transitional provision under article 8 stating that member states may allow the placing on the market and putting into service complying to the national provisions into force at the time of and coming into force after the adoption of the Ecodesign Regulations

* 01/01/2024: Revision ecodesign requirements for solid fuel local space heaters and

energy labelling regulation

# *Review*

# Ecodesign local space heaters (EU) 2015/1188

A review of this regulation is foreseen in 2019.

The review shall assess:

* The appropriateness of setting stricter requirements for energy efficiency and emissions of NOx;
* The verification tolerances;
* The validity of the correction factors used for assessing the seasonal space heating energy efficiency of local space heaters;
* The appropriateness of introducing third party certification.

# Ecodesign solid fuel local space heaters (EU) 2015/1185

A special review to assess the appropriateness of introducing a 3rd party certification is foreseen in 2018. A full review of the regulation will follow in 2024.

This full review shall assess:

* The appropriateness of setting stricter requirements for energy efficiency, NOx, PM, CO and OGC;
* The verification tolerances.

# Energy labelling local space heaters

A review of this regulation is foreseen in 2024.

This review shall assess whether the exemptions can be reduced.

#  Key requirements

# *Ecodesign requirements*

For local space heaters the seasonal space heating efficiency is the key parameter.

Heating demand is not constant over the year. To reflect these seasonal differences, the part load behaviour is taken into account in the seasonal space heating energy efficiency for commercial local space heaters, except for electric commercial local space heaters. For all the other local space heaters, only the useful efficiency at nominal heat output is considered in the seasonal space heating energy efficiency. The energy efficiency requirements are technology specific and in some cases fuel and size dependent.

In addition to the energy efficiency criteria, the regulation defines additional compliance criteria aimed at reducing other relevant environmental impacts, including:

* NOx emissions for fuel-based local space heaters;
* PM, OGC emissions and CO emissions for solid fuel local space heaters.

For NOx emissions the requirements are technology dependent. For gaseous and liquid fuel local space heaters, the regulation prescribes emission levels in relation to the fuel input expressed in mg NO2,equivalent / kWhinput; for the solid fuel local space heaters the regulation prescribes emission content in flue gas expressed in mg NO2,equivalent/m³.

Particulate matter emission of the solid fuel local space heaters is expressed in mg PM /m³ or g PM/kg, depending on the selected measurement method. Requirements are technology dependent.

For organic gaseous compounds and carbon monoxide emissions of solid fuel local space heaters, the emissions levels are expressed in mg OGC / m³ and mg CO /m³ respectively and are technology and/or fuel dependent.

The following table gives an overview of the criteria to be fulfilled as well as the dates on which these criteria come into force.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|   | **Space heating energy efficiency** | **Emissions of nitrogen oxides** | **Emissions of particulate matter** | **Emissions of organic gaseous compounds** | **Emissions of carbon monoxide** |
| **TIER I Local space heaters** | 01/01/2018 | 01/01/2018 |  |  |  |
| **TIER I Solid fuel local space heaters** | 01/01/2022 | 01/01/2022 | 01/01/2022 | 01/01/2022 | 01/01/2022 |
| **Gaseous fuel local space heaters**  |  |  |  |  |  |
| **Liquid fuel local space heaters**  |  |  |  |  |  |
| **Electric local space heaters** |  |  |  |  |  |
| **Solid fuel local space heaters**  |  |  |  |  |  |
| **Cookers** |  |  |  |  |  |

# *Energy labelling requirements*

The energy labelling requirements address manufacturers as well as dealers to ensure correct and consistent use of the label throughout the supply chain.

The energy labelling requirements coming into force in January 2018 will go from A++ to G. In addition, the ecodesign requirements will render the lowest scoring products obsolete.

From January 2018, manufacturers have to consider following issues regarding labelling information:

* For each local space heater in scope, a printed label in accordance with the regulation has to be provided.
* A product fiche has to be provided. This product fiche shall be included in the product brochure or other literature provided with the product.
* Technical documentation in accordance with the regulation has to be provided to the Commission or to the market surveillance authorities on request.
* Product advertisements are required to reference the seasonal space heating energy efficiency class.
* Suppliers must make the label and the fiche available to dealers in electronic format for each model.

The obligations for the dealer are:

* At the point of sale, each local space heater on display shall be equipped with the respective printed energy label.
* Products marketed without the end user being able to see the label shall be accompanied with the relevant information laid down in the product fiche by the manufacturer
* Advertisements are required to reference the seasonal space heating energy efficiency class.
* Technical promotional material is also required to reference the seasonal space heating energy efficiency class.
* For selling through the internet, dealers must show the label and the fiche, made available in electronic format by the manufacturer.

The dealers must be provided with the label and the additional information by the supplier in such a way that they are able to provide the necessary information to customers. The technical parameters to be communicated are defined in Annex V and Annex II of the Ecodesign Regulation for local space heaters and solid fuel local space heaters respectively; and Annex V of the Energy Labelling regulation.

# Measurements and calculations, the Relationship between the regulations, the Commission communication (2017/C 076/02) and harmonised standards

For purposes of conformity assessment and verification of compliance, measurements and calculations shall preferably be done by using harmonised standards.

If the reference numbers of the standards have not been published in the Official Journal of the European Union, the standards have not been recognised by the European Commission as providing presumption of conformity with the Regulations. In that case, the regulations have to be applied in combination with the Commission communications, also referred to as the transitional methods.

In case the Commission communication and/or the standard contradict the regulation, the regulation prevails.

# Frequently asked questions

***Use and obligations regarding the label***

1. ***Is voluntary application of the label before the official introduction admitted? How to ensure uniform application in the EU?***

Voluntary application of the label before the official implementation date is not allowed under the Energy Labelling Directive which establishes that the supply and subsequent display of a label before the date specified in a delegated act falls under "unauthorized use" of the label, which is defined in Article 2(k) of Directive 2010/30/EU as the use of the label, other than by Member State authorities or EU institutions, in a manner not provided for in the Directive or in a delegated act. Delegated acts specify the date from which a particular label shall be supplied. If it is supplied and subsequently displayed before that date, the label is thus used in a manner not provided for in the delegated act.

Label classes (e.g. A+++), that are subject to further regulatory measures, must not be used before the date of coming into force of that specific label.

It is to be recognised that manufacturers need time to prepare for the coming into force of the requirements. In this respect, the Commission services would not recommend market surveillance authorities to take actions against a manufacturer providing the label through its distribution chain a reasonable amount of time before the date of application of the requirements (i.e. 1 January 2018).

1. ***Can the energy label be displayed before application at trade fairs, where products are not sold and end-users do not have access (the fairs are only for professional intermediates, such as installers)?***

The energy labelling Regulations establish that the dealer has to ensure that each local space heater bears the label at the point of sale. During a trade fair, placing on the market is not taking place, there is no obligation to display the label and at the same time information can be provided to professionals about the energy labelling class of the product. Even if no energy labelling legal requirements apply, common sense dictates that in order to provide accurate information, the labels displayed shall be in line with the relevant regulations.

1. ***Should the energy label be delivered together with the local space heater inside the box, or could it be provided for each local space heater by means of separate literature regarding the product, websites, brochures, evidence at sales point, etc.?***

According to Article 3 of Regulation 2015/1186, the label shall be printed; there is no specific indication on where to provide it, but websites cannot be used to provide “printed” labels. It is to be understood that the dealer has to be provided with correct and clear information on the energy performance of heaters. The label may be delivered together with supplementary material as long labels are provided with each local space heater.

1. ***With regard to the obligation to communicate the efficiency class, the definitions of energy related information and technical parameters are unclear (e.g. are dimensions technical parameters?).***

Dealers are obliged to provide information on the energy efficiency of the product together with any technical promotional material or together with information describing the technical parameters of the product. The technical parameters are reflected in Annex V of the Energy Labelling Regulation. Dimensions are not listed as technical parameters.

1. ***Is a price list of the supplier, which is used for dealers only, defined as technical promotional material?***

Any advertisement relating to a specific product and containing price information has to include a reference to the efficiency of the product. As price lists obviously include information on prices, they are covered by this obligation.

1. ***Are products delivered to dealers before the 1st of January 2018 subject to the energy labelling requirement?***

Article 3 states that the energy labelling requirement is only applicable to the products that are placed on the market or put into service from 1 January 2018 onwards.

Products that were placed on the market before 1 January 2018 do not have to be accompanied by the energy label.

1. ***What happens if a label has not the exact dimensions as indicated in (EU) 2015/1186 Annex III?***

The format and dimensions of the label as laid down in the Regulation have to be respected.

The Member States are responsible for assessing compliance with the requirements, including the label format.

1. ***On energy the label, the direct heat output needs to be displayed, should this be the gross calorific value or the net calorific value?***

For domestic local space heaters energy efficiency and direct heat output need to be displayed in net calorific value.

***Entry into force and Implementation***

1. ***What will actually happen when the regulations are entering into force? Are implemented?***

The Regulations entered in force on 10 August 2015 (i.e. 20 days after their publication in the Official Journal of the European Union).

The ecodesign requirements for local space heaters ((EU) 2015/1188) become applicable on 1 January 2018; the ecodesign requirements for solid fuel local space heaters ((EU) 2015/1185) become applicable on 1 January 2022. From these dates, local space heaters in scope of the respective regulations placed on the EU market have to comply with the ecodesign requirements.

For further details on the concept of placing on the market, please see section 2.3 of the Blue Guide:

<http://ec.europa.eu/growth/tools-databases/newsroom/cf/itemdetail.cfm?item_id=7326&lang=en&title=%E2%80%98Blue-Guide%E2%80%99-on-the-implementation-of-EU-product-rules>

1. ***Which time frame before the implementation date of the ecodesign requirements is tolerated for manufacturers to deliver their appliances to dealers and distributers?***

The Ecodesign Regulations set requirements on the products at the time of their placing on the market.

If products are placed on the market before the application date of the ecodesign requirements, they do not have to comply with the ecodesign requirements.

***Scope***

1. ***When a local space heater has two modes, one autonomous and the other non-autonomous, does it fall under the definition of a slave heater (exception in Article 1.g. of regulation (EU) 2015/1188)?***

The definition of a slave heater article 2, definition (19), states that a slave heater is not capable of autonomous operation.

In case a product has two modes,one autonomous and the other non-autonomous, it is capable of autonomous operation, therefore it is not exempted by article 1 g.

1. ***If a local space heater and a control are sold separately, but the manual states that both products are intended to be installed and used together, are they to be seen as a product and in the scope of the eco-design regulation?***

Yes. In case the manual states that the local space heater and the control are intended to be installed and used together, the combined product has to comply with the regulation, even when the local space heater and the control are sold separately.

1. ***Are manually restored historical stoves in scope of Regulation (EU) 2015/1186?***

In case such historical stoves are not 'factory assembled' or 'if they are not provided as prefabricated components or parts by a single manufacturer which are assembled on site', they can benefit from exemption (g) in article 1 of regulation (EU) 2015/1186.

1. ***Are towel rails in the scope of 2015/1188?***

If a 'towel heater' is not capable of reaching and maintain a certain thermal comfort within an enclosed space in which the product is situated then it is not a 'local space heater' as defined Article 2(1) of the Regulation and thus out of the scope of the regulation. If it is capable of doing so, it is covered by the regulation, unless it is "specified for purposes other than indoor space heating to reach and maintain a certain thermal comfort of human beings by means of heat convection or heat radiation" as specified in Article 1(b) of the Regulation, i.e. clearly advertised and offered for sale to be for heating towels.

1. ***Are spot heaters, i.e. small fan heaters used as supplementary heating, in scope of 2015/1188?***

Same reasoning applies as in 13.

1. ***Can pure on-off controllers still be sold after the implementation date of the ecodesign requirements?***

Yes. Controls do not fall under the regulation. The regulation does not put any requirement on separate sales of controls, unless if they would fall under the definition of ‘local space heater’.

1. ***The correction factors F(2) and F(3) relate to local space heaters equipped with a type of control. What happens if consumers continue to buys the local space heater without the control for which the manufacturer claims correction factors F(2) and F(3)? Is there an installer/reseller responsibility?***

Ecodesign regulations set requirements for manufacturers/importers at the time of placing on the market.

To make sure that the products are sold together by the installer or reseller, the instruction manuals for installers and end-users need to clearly mention that the unit is to be installed with the control for which he claims correction factors F(2) and F(3), and need to include a description on how to install it.

If products were placed on the market before the implementation date specified in the regulation, they do not need to comply.

1. ***Are air heating product in scope of Regulation (EU) 2016/2281 excluded from the scope of the Ecodesign Regulation (EU) 2015/1188?***

Yes. The heat generator of the local space heater provides heat directly to the space it is situated in; these products are in scope of (EU) 2015/1188. The heat generator of an air heating product provides heat to an air based heating and does not heat the space it is situated in directly; these products are in scope of (EU) 2016/2281.

1. ***Are fan coil units or mix radiators local space heaters as per the regulation?***

No. As long as the fan coil units and mix radiators are not equipped with one or more heat generators, they are not local space heaters as per the definition in the regulation.

Fan coil units are in scope of Regulation (EU) 2016/2281.

1. ***What is the “extended period, as declared by the manufacturer” described in Article 2 points (27) and (29) of the Ecodesign Regulation (EU) 2015/1188 or the “extended period, as declared by the supplier” in Article 2 point (26) of the Energy Labelling Regulation 2015/1186?***

The aim of the “extended period” is to include cases where there is a boost function on the electric local space heater that allows having a higher heat output that can be maintained continuously for a certain period of time.

1. ***Are flueless local space heaters in scope of the regulation?***

If a flueless heater is able to heat indoor space to reach and maintain a certain thermal comfort of human beings by means of heat convection or heat radiation, it is in the scope of the regulations and has to comply with the information requirements specified in the ecodesign regulation and the labelling requirements in the energy labelling regulation.

If the flueless is not able to heat indoor space to heat indoor space to reach and maintain a certain thermal comfort of human beings by means of heat convection or heat radiation', e.g. a decorative flueless heater, it is exempted from the regulation by art 1. (b) of both regulations.

***Measurement and calculation***

1. ***Can correction factors for electric local space heaters be claimed if the control is not provided with the appliance?***

As per the definitions, the product needs to be “equipped” with the controls when placed on the market. This means that the control can be external, but it needs to be provided with the product in order to claim the bonus; the packaging does not need to be the same.

1. ***Can an appliance equipped with an electronic room temperature control integrated in the product and sold with a connection function to a programmable external user interface through a remote connection (wire or wireless) allowing each connected product to be operated on e.g. a weekly basis (week timer), be considered as complying with the definition for “with electronic room temperature control plus week timer”?***

When the electronic room temperature control of the unit is integrated in the product and when the external part is merely a user interface (e.g. app on a phone), it can be considered that the product is 'equipped with electronic room temperature control'. At this point, the user interface can control several products, given that the control itself is integrated in each separate product.

In case the manufacturer claims a correction factor F(2) or F(3), but the control cannot be operated as per the claimed correction factors without the user interface, the instruction manuals for installers and end-users need to clearly mention that the unit is to be installed with the user interface and need to include a description on how to install it.

1. ***Does a product without display, but equipped with a daily programming function (e.g. heater programmed manually by choosing between settings on day one; heater automatically repeats these settings on the following days) comply with the definition 'with electronic room temperature control plus day timer'.***

Yes. The definition of 'with electronic room temperature control plus day timer' in the regulations does not specify manually/automatic, or with/without display.

1. ***Does a product without display but equipped with two weekly “factory pre-set” programs P1/P2 (user-selectable) comply with the definition “with electronic room temperature control plus week timer”?***

Yes. The definition does not specify who should specify the settings and how many possibilities there should be.

1. ***When a product has no standby mode, does it mean that F4 = 0, whatever is its power consumption?***

For electrical space heaters:

$$F\left(4\right)=CC.\frac{a.el\_{sb}}{P\_{nom}}.100\left[\%\right]$$

If there is no standby mode $el\_{sb}$=0, and consequently $F\left(4\right)$=0.

For local space heaters using fuels:

$$F\left(4\right)=CC.\frac{0,2.el\_{max}+0,8.el\_{min}+1,3.el\_{sb}}{P\_{nom}}.100\left[\%\right]$$

If there is no standby mode $el\_{sb}$=0, $F\left(4\right)$≠0 seeing that the auxiliary modes remain.

1. ***In Annex III (f) of Regulation 2015/1188, α is by default 0 if the product complies with the limit values set in Regulation (EC) No 1275/2008. What are these limit values?***

In the regulation there are limit values for standby and for off mode power consumption, see Annex II of Regulation (EU) No 1275/2008:

|  |  |  |
| --- | --- | --- |
|  | Description | Limit values |
| Off mode | Power consumption of equipment in any off-mode condition | 0.5 W |
| Standby mode | Power consumption of equipment in any condition providing only a reactivation function, or providing only a reactivation function and a mere indication of enabled reactivation function | 0.5 W |
| Power consumption of equipment in any condition providing only information or status display, or providing only a combination of a reactivation function and information or status display | 1 W |

For α to be 0, the product has to comply with both the limit values for off mode and standby mode.

1. ***A local space heater with an electronic room temperature control will run in transitional periods of thermostat on and thermostat off. During thermostat off the appliance is still operational (Thermostat off periods are those periods when the unit is operating, but where there is no load in the building and hence the thermostat switches off). Should these “off” periods considered as “stand by”?***

The standby mode only provides one of the following functions:

* a reactivation function with or without an indicator showing that this function is enabled;
* and/or information or status display .

Any mode that provides other functions than reactivation function, or reactivation function and only an indication of enabled reactivation function, and/or information or status display, is not considered as standby mode.

1. ***Are the correction factors to be subtracted / summed as percentage points or percent of the son value?***

The correction factors are in percentage points.

1. ***If an electric radiant heaters is fixed, can the factors F(3) for radiant and fixed be accumulated?***

An electric radiant local space heater is a separate class of local space heater in the regulation with separate requirements.

As such, when the local space heater falls under the definition of radiant local space heaters, it does not matter whether it is fixed or portable, the requirements for a radiant local space heater apply.

In view of Annex III, Table 8, of Regulation 2015/1188, this means that for a radiant local space heater, only the F(3) factor for radiant heaters applies (e.g. for radiant local space heater with distance control option i.e. 1%) and that cumulating the F(3) factors for different type of heaters is not allowed.

On the other hand, cumulating the different control options in Table 8 is allowed in the regulation. If the radiant heater has e.g. a distance control option and a room temperature control with open window detection, then the F(3) would be 1% + 1%.

1. ***Should portable appliances sold with features which can be used to fix it on a wall have to comply with ecodesign requirements applicable to fixed room heaters? Should a fixed appliance sold with a kit of castors be considered as a portable?***

The classification of the electric local space heater is dependent on its intended use and how it is marketed (in the catalogues, leaflets, etc.).

If the product is marketed as a local space heater that can be used either as a portable or as a fixed local space heater, then it has to comply with the most stringent requirements, i.e. these of the fixed local space heaters. For purposes of compliance with the regulation, this product is an electric fixed local space heater.

If the product is marketed as a fixed product, it is an electric fixed local space heater as per the regulation and has to comply with the corresponding requirements.

If the product is marketed as a portable product, it is an electric portable local space heater as per the regulation and has to comply with the corresponding requirements.

1. ***Does an electric fixed radiant local space heater have to comply with the requirements of an electric radiant local space heater or an electric fixed local space heater?***

The requirements for electric radiant space heaters are applicable to all types of electric radiant space heaters independent of whether they are fixed or portable.

***Information requirements***

1. ***How to manage the technical documentation and information for hybrid solid fuel local space heaters (e.g. pellets + wood logs or wood logs + coal)?***

The regulation defines in article 2, (14) of regulation (EU) 2015/1185 the concept of 'preferred fuel'.

In Table 1, several type of fuels are identified, including some blended fuels.

The manufacturer needs to select one of the specified fuels as preferred fuel.

In Table 1, the parameters s, PM, OGC, CO and NOx need to be given for all fuels the unit is marketed to be operated with; the parameters for the heat output, useful efficiency, auxiliary electricity consumption, permanent pilot flame power requirement need to be given for the preferred fuel only.

Ecodesign requirements need to be fulfilled with all fuels the unit is marketed to be operated with.

1. ***Which heat output is to be indicated on the label, nominal, minimum or maximum heat output?***

The nominal heat output.

1. OJ L 193, 21.7.2015, p. 20. [↑](#footnote-ref-1)
2. OJ L 193, 21.7.2015, p. 76. [↑](#footnote-ref-2)
3. OJ L 193, 21.7.2015, p. 1. [↑](#footnote-ref-3)
4. https://circabc.europa.eu/faces/jsp/extension/wai/navigation/container.jsp?FormPrincipal:\_idcl=FormPrincipal:\_id1&FormPrincipal\_SUBMIT=1&id=6749efaf-92c2-491e-a503-d860573ddb1e&javax.faces.ViewState=QAs1ev8cUW9UIn95lGP70uVsJTJd25D0i%2Fra1Jy98kO7fZ%2Ft13Qk6zcGv68T1NBI0g8MiVSEmtcU9Sme%2Bn%2BfzylYlhSL2TSB2D%2Fq8MycwfefU%2FMjdmJ%2FyRB8rWMuACeHFp6Sw7%2BsiD4GDow2KYecBMNytcw%3D. [↑](#footnote-ref-4)