Public consultation on the review of Regulation (EU) 2015/1185 setting ecodesign requirements for solid fuel local space heaters

Introduction

Public Consultation on the review of Commission Regulation (EU) 2015/1185 with regards to ecodesign requirements for solid fuel local space heaters

Context

Ecodesign legislation helps to improve the energy efficiency and environmental performance of energy-consuming products on the EU market. It sets common EU-wide standards to remove the least performing products from the market, reducing greenhouse gas emissions while helping consumers to save money on their household energy bills.

For solid fuel local space heaters (popularly known as stoves), commonly using logs, wood chips, wood pellets, coal or other types of solid fuel, ecodesign requirements should not only improve the energy efficiency of products but also reduce pollutant emissions. Since January 2022, solid fuel local space heaters with a rated heat output of 50 kW or less are subject to minimum energy efficiency requirements and to limits on the emissions of pollutants.

What is the purpose of this consultation?

The Commission is now reviewing the current ecodesign measures for solid fuel local space heaters, laid down in Regulation (EU) 2015/1185.

The purpose of the consultation is to gather feedback from society that can be later used in the performance of that review.

How can I participate?

This survey is tailored depending on the type of respondent, therefore you must answer only to the section that corresponds to your activity. The available sections are:

- Users of solid fuel local space heaters: questions U1 to U45
- Retailers selling solid fuel local space heaters: questions R1 to R30
- Installers/repairers of solid fuel local space heaters: questions I1 to I24
- Manufacturers of solid fuel local space heaters: questions M1 to M29
- NGOs/General public not user of a solid fuel local space heater: questions N1 to N14
Scope of the survey

The figure and pictures below describe the equipment in the scope of this questionnaire, which can be broken down into stoves and cookers. The common term used is “local space heater”, since it applies to equipment that heats the room in which it is placed. This equipment uses solid fuel such as wood pellets, wood chips, wood logs, and coal. Equipment that provides central heating and able to heat several rooms at the same time such as boilers, are excluded from this questionnaire.

An example of stove in the scope of the questionnaire is provided below.
About you

* Language of my contribution
  - Bulgarian
  - Croatian
  - Czech
  - Danish
  - Dutch
  - English
  - Estonian
  - Finnish
  - French
  - German
  - Greek
  - Hungarian
  - Irish
  - Italian
  - Latvian
  - Lithuanian
  - Maltese
  - Polish
  - Portuguese
  - Romanian
  - Slovak
  - Slovenian
  - Spanish
  - Swedish

* I am giving my contribution as
  - Academic/research institution
  - Business association
  - Company/business
  - Consumer organisation
  - EU citizen
  - Environmental organisation
Non-EU citizen
Non-governmental organisation (NGO)
Public authority
Trade union
Other

* First name
Cristina

* Surname
Pricop

* Email (this won't be published)
cristina.pricop@epha.org

* Organisation name
European Public Health Alliance (EPHA)

* Organisation size
- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number
18941013532-08

* Country of origin
Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

Afghanistan  Djibouti  Libya  Saint Martin
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Colombia  Jersey  Pitcairn Islands  Uruguay

Comoros  Jordan  Poland  US Virgin Islands

Congo  Kazakhstan  Portugal  Uzbekistan

Cook Islands  Kenya  Puerto Rico  Vanuatu

Costa Rica  Kiribati  Qatar  Vatican City

Côte d'Ivoire  Kosovo  Réunion  Venezuela

Croatia  Kuwait  Romania  Vietnam

Cuba  Kyrgyzstan  Russia  Wallis and Futuna

Curaçao  Laos  Rwanda  Western Sahara

Cyprus  Latvia  Saint Barthélemy  Yemen

Czechia  Lebanon  Saint Helena Ascension and Tristan da Cunha  Zambia

Democratic Republic of the Congo  Lesotho  Saint Kitts and Nevis  Zimbabwe

Denmark  Liberia  Saint Lucia

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. For the purpose of transparency, the type of respondent (for example, ‘business association’, ‘consumer association’, ‘EU citizen’) country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

**Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.
**Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

**Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions

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**User questionnaire**

U1. Please choose the option that best reflects your respondent category:

- User - Responding about a residential building
- User - Responding about a non-residential building

U2. Where is your building located?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
U3. Which option better describes the location of your building?
- Urban
- Suburban
- Rural

U4. Which solid fuel heating system(s) do you use? (more than one option can be chosen)
- Stove
- Cooker (i.e. primarily to heat food)
- None (I don’t use solid fuels for heating or indoor cooking)

If you chose “stove”, please answer questions U5 to U21 and U34 to U45. If you chose “cooker”, please answer questions U22 to U45. Questions U34 to U45 are common to both categories.

STOVES

U5. Which of the following fuels do you use in the stove?
- Wood pellets
- Wood briquettes
- Log wood
- Charcoal
Peat
Mineral fuels (e.g. lignite or anthracite coal)
Other

If you chose "other", please specify the type of fuel

1000 character(s) maximum

U6. Approximately how old is your stove? (to the nearest number of years)

50 character(s) maximum
U7. Approximately how much did your stove cost, in €?

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<th>Purchase cost</th>
<th>Installation cost</th>
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U8. Has your stove ever been repaired (not including routine maintenance)?
   - No
   - Yes, just once
   - Yes, more than once
   - No opinion

If you answered “yes”, please explain what failed:

1000 character(s) maximum

U9. If you answered “yes” to U8, how old was the stove when it was repaired?
   - Less than 2 years
   - Between 2 and 10 years
   - More than 10 years
   - No opinion

U10. If you answered “yes” to U8, was it easy to get it repaired?
   - Yes
   - No
   - No opinion

U11. If you answered “yes” to U8, and if you repaired the stove yourself, was it easy to find spare parts?
   - Yes
   - No
   - No opinion

U12. How long is the warranty of your stove, in months, in addition to the two years that are mandatory by law?

50 character(s) maximum

U13. Is your stove linked to a central heating system or water heater?
   - Yes
   - No
U14. How often do you use your stove?

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U15. Do you use your stove?
- ◯ As main heat source
- ◯ As secondary heat source, in case central heating does not provide enough heat
- ◯ As secondary source, in case of failure of supply of electricity or gas
- ◯ As secondary source, in case of too high prices of electricity or gas
- ◯ Other

If you chose "other", please explain

50 character(s) maximum

U16. Approximately how much (in €/year) did you spend on fuel for your stove?

50 character(s) maximum

U17. How much do you pay (in €/unit) for fuel? (please specify the unit too, e.g. per kg, per tonne, per m3 etc.)

50 character(s) maximum

U18. Is your stove open fronted (combustion zone and exhaust is open to the space to be heated, like a traditional fireplace) or closed fronted (combustion zone and exhaust is separated from the space to be heated via a hatch, pane or similar)?
U19. Is your solid fuel stove inset (situated within a recess of the wall, like an existing chimney cavity) or freestanding (standing out from the wall)?
- Inset
- Freestanding

U20. When the room is warm enough or too warm already, what do you do to reduce the amount of heat output?
- I turn down the air valve
- I extend the refueling interval
- I feed less fuel each time I have to reload the stove

U21. When you decide to replace your stove, which is the most likely option?
- I will replace it with a centralized heating system
- I will buy a stove using a heat source other than solid fuel (e.g. gas, oil, electricity)
- I will buy a new solid fuel stove of similar energy efficiency
- I will buy a new solid fuel stove more energy efficient
- I will buy a new solid fuel stove without really looking at energy efficiency

COOKERS

U22. Which of the following fuels do you use in the cooker?
- Wood pellets
- Wood briquettes
- Log wood
- Charcoal
- Peat
- Mineral fuels (e.g. lignite or anthracite coal)
- Other

If you chose "other", please specify type of fuel

1000 character(s) maximum
U23. Approximately how old is your cooker? (to the nearest year)

50 character(s) maximum
U24. Approximately how much did your cooker cost, in €?

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U25. Has your cooker ever been repaired (not including routine maintenance)?
- No
- Yes, just once
- Yes, more than once
- No opinion

U26. If you answered “yes” to U25, how old was the cooker when it was repaired?
- Less than 2 years
- Between 2 and 10 years
- More than 10 years
- No opinion

U27. If you answered “yes” to U25, was it easy to get it repaired?
- Yes
- No
- No opinion

U28. If you answered “yes” to U25 and if you repaired the cooker yourself, was it easy to find spare parts?
- Yes
- No
- No opinion

U29. How long is the warranty of your cooker, in months, in addition to the two years that are mandatory by law?

50 character(s) maximum

U30. Is your cooker linked to a central heating system or water heater?
- Yes
- No

U31. How often do you use your cooker?

<table>
<thead>
<tr>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very rarely (e.g. &lt; 1 a month)</td>
</tr>
<tr>
<td>Rarely (e.g. &lt; 1 a week)</td>
</tr>
<tr>
<td>Regularly (e.g. several times per week)</td>
</tr>
<tr>
<td>Very often (e.g. &lt; every day for a limited time)</td>
</tr>
<tr>
<td>Prolonged (e.g. &gt;4 hours per day)</td>
</tr>
</tbody>
</table>
U32. Approximately how much (in €/year) did you spend on fuel for your cooker?

50 character(s) maximum

U33. How much do you pay (in €/unit) for fuel? (please specify the unit too, e.g. per kg, per tonne, per m³ etc.)

50 character(s) maximum

COMMON SECTION TO STOVES AND COOKERS

U34. How important are for you the following aspects when choosing a specific model of solid fuel local space heater among the models in the market?

<table>
<thead>
<tr>
<th></th>
<th>Very important</th>
<th>Somewhat important</th>
<th>Not important</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Better energy efficiency</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lower price</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lower emission of pollutants</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Potential to use local fuels and to replace gas and electricity</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lower CO₂ emissions</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

U35. How supportive are you of having EU regulations that:

<table>
<thead>
<tr>
<th></th>
<th>Strongly against</th>
<th>Against</th>
<th>Neutral opinion</th>
<th>Supportive</th>
<th>Strongly supportive</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>...set minimum energy efficiency requirements for solid local space heaters on the EU market</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
U36. Should the minimum energy efficiency performance requirements set out in Regulation (EU) 2015/1185 be more ambitious?

- Yes
- No
- No opinion

Please explain your choice. If you chose yes, could you suggest what the new value (s) should be?

1000 character(s) maximum

U37. Are you aware of technological improvements developed over the last years that would support raising the minimum energy efficiency performance thresholds? Which ones?

1000 character(s) maximum

U38. Are you concerned about the potential effect of solid fuel local space heaters on air quality in your area?

- Yes
- No
- No opinion

Please explain why

1000 character(s) maximum

U39. Should the requirements on pollutant emissions set out in Regulation (EU) 2015/1185 be more ambitious?

- Yes
- No
- No opinion
Please explain why

1000 character(s) maximum

U40. Are you aware of technological improvements developed over the last years that would support lowering the pollutant emission limits? Which ones?

1000 character(s) maximum

U41. Apart from the pollutants already regulated, should new pollutants be included in the revision of Regulation (EU) 2015/1185?

- Yes
- No
- No opinion

Please explain your choice. If you chose “yes”, what new pollutants should be included in the Regulation and why?

1000 character(s) maximum

U42. Current ecodesign rules cover particulate matter (PM) as a whole, rather than specifying any particular fractions. Finer PM fractions (PM2.5 and smaller) are known to have the greatest health impacts. Should the current requirements for PM emissions be revised?

- Yes, by differentiating particles by size (PM10, PM2.5 and ultrafine particles) in the technical information of the product
- Yes, by setting mandatory limits to particulate matter depending on its size (PM10, PM2.5 and ultrafine particles)
- Yes, but none of the two options above are adequate
- No
- No opinion

Please explain your choice

1000 character(s) maximum
U43. Are you aware of any regional or national initiatives that promote or restrict the installation and/or use of solid fuel local space heaters?

☐ Yes
☐ No

If you answered “yes”, please enter the names or links to the initiatives

1000 character(s) maximum
U44. Circular economy aspects are increasingly being introduced into ecodesign regulations for different products. To what extent would you support that the following circular economy requirements for solid fuel local space heaters are introduced in future regulatory reviews?

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Strongly against</th>
<th>Against</th>
<th>Neutral opinion</th>
<th>Supportive</th>
<th>Strongly supportive</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mandatory availability of spare parts for 10 years</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>Access to repair and maintenance information</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>Reparability score on the basis of the weighted average of a number of aspects such as the disassembly steps, the need of specific tools for assembly /disassembly or the use of removable/ reusable fasteners</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>Minimum recycled content (e.g. making mandatory the recyclability of around 90% of the product)</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
</tbody>
</table>
Would you suggest modifications to the aspects included in the table or including new ones?

1000 character(s) maximum

U45. Please feel free to add any further comments or reflections about solid fuel local space heaters

1000 character(s) maximum

Retailer questionnaire

R1. In which countries do you sell solid fuel local space heaters?

1000 character(s) maximum

R2. Which types of solid fuel local space heaters do you sell?

- [ ] Stoves < 15 kW nominal heat output
- [ ] Stoves 15 to 50kW nominal heat output
- [ ] Cookers

If you chose “stoves”, please answer questions R3 to R10 and R16 to R30. If you chose “cookers”, please answer questions R11 to R15 and R16 to R30. Questions R16 to R30 are common to both categories.

STOVES

R3. What is the typical lifetime range of solid fuel stoves? (in years)

50 character(s) maximum

R4. How have your sales evolved since 2015 regarding the fuel used?

1000 character(s) maximum
R5. Please select the percentages of your sales on the basis of the solid fuel used: (Answers should balance out to sum up to around 100%) (in case of stoves able to use several types of fuels, please choose only the preferred one, as declared by the manufacturer)

<table>
<thead>
<tr>
<th>Fuel Type</th>
<th>None</th>
<th>Very low share (&lt; 10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
<th>Very high share (70-90%)</th>
<th>Dominant share (&gt;90%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wood log</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Wood briquettes</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Wood pellets</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Fossil fuel (e.g. coal)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Other types of solid fuel (e.g. charcoal)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>
R6. Please select the percentages of your sales on the basis of the type of installation: (Answers should balance out to sum up to around 100%)

<table>
<thead>
<tr>
<th></th>
<th>None</th>
<th>Very low share (&lt;10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
<th>Very high share (70-90%)</th>
<th>Dominant share (&gt;90%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inset, open fronted</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inset, closed-fronted</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Freestanding, open-fronted</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Freestanding, closed-fronted</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
R7. What is the typical purchase price range of solid fuel stoves, in €?

50 character(s) maximum

R8. What is the typical installation cost range of solid fuel stoves, in €?

50 character(s) maximum

COOKERS

R9. What is the typical lifetime range of solid fuel cookers, in years?

50 character(s) maximum
R10. Please select the percentage of your sales volumes on the basis of the fuel used: (Answers should balance out to sum up to around 100%) *(in case of cookers able to use several types of fuels, please choose only the preferred one, as declared by the manufacturer)

<table>
<thead>
<tr>
<th></th>
<th>None</th>
<th>Very low share (&lt; 10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
<th>Very high share (70-90%)</th>
<th>Dominant share (&gt;90%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wood log</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
</tr>
<tr>
<td>Wood briquettes</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
</tr>
<tr>
<td>Wood pellets</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
</tr>
<tr>
<td>Fossil fuel (e.g. coal)</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
</tr>
<tr>
<td>Other types of solid fuel (e.g. charcoal)</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
<td>⭕</td>
</tr>
</tbody>
</table>
R11. What is the typical purchase price range of solid fuel cookers, in €?

50 character(s) maximum

R12. What is the typical installation cost range of solid fuel cookers, in €?

50 character(s) maximum

R13. How have sales evolved since 2015 on the basis of the solid fuel used?

1000 character(s) maximum
R14. Please select the percentages of your sales on the basis of the solid fuel used: (Answers should balance out to sum up to around 100%) (in case of cookers able to use several types of fuels, please choose only the preferred one, as declared by the manufacturer)

<table>
<thead>
<tr>
<th>None</th>
<th>Very low share (&lt; 10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
<th>Very high share (70-90%)</th>
<th>Dominant share (&gt;90%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wood log</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
</tr>
<tr>
<td>Wood briquettes</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
</tr>
<tr>
<td>Wood pellets</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
</tr>
<tr>
<td>Fossil fuel (e.g. coal)</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
</tr>
<tr>
<td>Other types of solid fuel (e.g. charcoal)</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
<td>☄️</td>
</tr>
</tbody>
</table>
R15. In case of other fuels not listed above that are relevant for solid fuel heating appliances, please specify here:

1000 character(s) maximum

COMMON SECTION TO STOVES AND COOKERS

R16. How important are the following aspects for your customers when choosing a specific model of solid fuel local space heater among the models in the market? (please place “X” in the corresponding cells)

<table>
<thead>
<tr>
<th>Aspect</th>
<th>Very important</th>
<th>Somewhat important</th>
<th>Not important</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Better energy efficiency</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lower price</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lower emission of pollutants</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Potential to use local fuels and to replace gas and electricity</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lower CO2 emissions</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

R17. How supportive are you of having EU regulations that:

<table>
<thead>
<tr>
<th>Regulation Description</th>
<th>Strongly against</th>
<th>Against</th>
<th>Neutral opinion</th>
<th>Supportive</th>
<th>Strongly supportive</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>...set minimum energy efficiency requirements for solid local space heaters on the EU market</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>...set maximum limits for pollutant emissions from solid fuel local space heaters on the EU market</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

R18. Should the minimum energy efficiency performance requirements set out in Regulation (EU) 2015/1185 be more ambitious?

- Yes
- No
- No opinion
Please explain your choice. If you chose yes, could you suggest what the new value(s) should be?

1000 character(s) maximum

R19. Are you aware of technological improvements developed over the last years that would support raising the minimum energy efficiency performance thresholds?

1000 character(s) maximum

R20. Should the requirements on pollutant emissions set out in Regulation (EU) 2015/1185 be more ambitious?

- Yes
- No
- No opinion

Please explain your choice. If you chose yes, could you suggest what the new value(s) should be and for which pollutants?

1000 character(s) maximum

R21. Which technological improvements developed over the last few years would support the introduction of stricter limits for pollutant emissions?

1000 character(s) maximum

R22. One method to decrease pollutant emissions is to apply a post-combustion treatment by means of e.g a mechanical or electrostatic particle filter. Do you sell any of the following ancillary products to reduce pollutant emissions from solid fuel local space heaters (or sell solid fuel local space heaters with any of these ancillary products already integrated)?

- Electrostatic precipitator
- Cyclonic separator
- Ceramic filter
- Catalyst
- Flue gas extraction fan
Automatic combustion air flow controls

Equipment not mentioned above

1000 character(s) maximum

R23. If you sell any of the devices listed in R22, please add some more details about how common these ancillary products are used

400 character(s) maximum
R24. How big a share of the solid fuel local space heaters is sold with post-combustion equipment?

<table>
<thead>
<tr>
<th>Share</th>
<th>None</th>
<th>Very low share (&lt;10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
<th>Very high share (70-90%)</th>
<th>Dominant share (&gt;90%)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><img src="image1.png" alt="Image" /></td>
<td><img src="image2.png" alt="Image" /></td>
<td><img src="image3.png" alt="Image" /></td>
<td><img src="image4.png" alt="Image" /></td>
<td><img src="image5.png" alt="Image" /></td>
<td><img src="image6.png" alt="Image" /></td>
<td><img src="image7.png" alt="Image" /></td>
</tr>
</tbody>
</table>
R25. By how much, in €, does the price of the solid fuel local space heater increase when incorporating such equipment?

R26. Apart from the pollutants already regulated, should new pollutants be included in the revision of Regulation (EU) 2015/1185?

- Yes
- No
- No opinion

Please explain your choice. If you chose “yes”, what new pollutants should be included in the Regulation and why?

R27. Current ecodesign rules cover particulate matter (PM) as a whole, rather than specifying any particular fractions. Finer PM fractions (PM2.5 and smaller) are known to have the greatest health impacts. Should the current requirements for PM emissions be revised?

- Yes, by differentiating particles by size (PM10, PM2.5 and ultrafine particles) in the technical information of the product
- Yes, by setting mandatory limits to particulate matter depending on its size (PM10, PM2.5 and ultrafine particles)
- Yes, but none of the two options above are adequate
- No
- No opinion

Please explain your choice

R28. Are you aware of any regional or national initiatives that promote or restrict the installation and/or use of solid fuel local space heaters?

- Yes
- No
If you answered “yes”, please enter the names or links to the initiatives

1000 character(s) maximum
R29. Circular economy aspects are increasingly being introduced into ecodesign regulations for different products. To what extent would you support that the following circular economy requirements for solid fuel local space heaters are introduced in future regulatory reviews?

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Strongly against</th>
<th>Against</th>
<th>Neutral opinion</th>
<th>Supportive</th>
<th>Strongly supportive</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mandatory availability of spare parts for 10 years</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Access to repair and maintenance information</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Reparability score on the basis of the weighted average of a number of aspects such as the disassembly steps, the need of specific tools for assembly /disassembly or the use of removable/ reusable fasteners</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Minimum recycled content (eg making mandatory the recyclability of around 90% of the product)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>
Would you suggest modifications to the aspects included in the table or including new ones?

1000 character(s) maximum

R30. Please feel free to add any further comments or reflections about solid fuel local space heaters

1000 character(s) maximum

**Installer/repairer questionnaire**

I1. Which of the following services does your company provide regarding solid fuel local space heaters?

- Installation
- Maintenance
- Repair

I2. In which countries do you install/maintain/repair solid fuel local space heaters?

1000 character(s) maximum

I3. Which types of appliances do you install/maintain/repair?

- Stoves < 15 kW nominal heat output
- Stoves between 15 to 50kW nominal heat output
- Cookers

If you chose “stoves”, please answer questions I4 to I10 and I17 to I24. If you chose “cookers”, please answer questions I11 to I16 and I17 to I24. Questions I17 to I24 are common to both categories

**STOVES**

I4. What is the typical lifetime range of solid fuel stoves? (in years)

50 character(s) maximum

I5. How have your installation volumes evolved since 2015 regarding the fuel used?

1000 character(s) maximum
I6. Please select the percentage of installations of stoves made by your company regarding the fuel used: (Answers should balance out to sum up to around 100%) (in case of stoves able to use several types of fuels, please choose only the preferred one, as declared by the manufacturer)

<table>
<thead>
<tr>
<th>Fuel Type</th>
<th>None</th>
<th>Very low share (&lt; 10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
<th>Very high share (70-90%)</th>
<th>Dominant share (&gt;90%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wood log</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Wood briquettes</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Wood pellets</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
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</tr>
<tr>
<td>Fossil fuel (e.g. coal)</td>
<td>☐</td>
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<tr>
<td>Other types of solid fuel (e.g. charcoal)</td>
<td>☐</td>
<td>☐</td>
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</tr>
</tbody>
</table>
I7. Please select the number of the installations made by your company (in percentage) on the basis of its type:
(Answers should balance out to sum up to around 100%)

<table>
<thead>
<tr>
<th>Installation Type</th>
<th>None</th>
<th>Very low share (&lt;10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
<th>Very high share (70-90%)</th>
<th>Dominant share (&gt;90%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inset, open fronted</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Inset, closed-fronted</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Freestanding, open-fronted</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
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<td>●</td>
<td>●</td>
</tr>
<tr>
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<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
</tbody>
</table>
I8. What is the typical purchase price range of solid fuel stoves, in €?

50 character(s) maximum

I9. What is the typical installation cost range of solid fuel stoves, in €?

50 character(s) maximum

I10. What is the typical cost range for the repair of solid fuel stoves, in €?

50 character(s) maximum

COOKERS

I11. What is the typical lifetime range of solid fuel cookers, in years?

50 character(s) maximum

I12. How have your installation volumes evolved since 2015 regarding the solid fuel used?

1000 character(s) maximum
I13. Please select the percentage of number of installations of solid fuel cookers made by your company on the basis of the fuel used:

<table>
<thead>
<tr>
<th></th>
<th>None</th>
<th>Very low share (&lt; 10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
<th>Very high share (70-90%)</th>
<th>Dominant share (&gt;90%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wood log</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Wood briquettes</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Wood pellets</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
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<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Fossil fuel (e.g. coal)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
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<td>☐</td>
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</tr>
<tr>
<td>Other types of solid fuel (e.g. charcoal)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>
I14. What is the typical purchase price range of solid fuel cookers, in €?

50 character(s) maximum

I15. What is the typical installation price range of solid fuel cookers, in €?

50 character(s) maximum

I16. What is the typical repair cost range of solid fuel cookers, in €?

50 character(s) maximum

COMMON SECTION TO STOVES AND COOKERS

I17. Please select which of the following issues are most common when repairing solid fuel local space heaters

- Inappropriate installation
- Inappropriate fuels
- Inadequate maintenance of the heater
- Inadequate maintenance of the flue duct
- Mechanical failure of parts

Other (please explain)

1000 character(s) maximum

I18. Typically how old are solid fuel local space heaters when they fail for the first time?

- Less than 2 years
- 3 to 10 years
- More than 10 years
- No opinion

I19. As a professional, do you have easy access to spare parts?

- Yes, always
- Yes, normally
Often not

- Never

If you answered “often not” or “Never”, can you please provide more details?

1000 character(s) maximum

I20. How long is the typical warranty of a solid fuel local space heater, in months, in addition to the two years that are mandatory by law?

50 character(s) maximum

I21. Are you aware of any regional or national initiatives that promote or restrict the installation and/or use of solid fuel local space heaters?

- Yes
- No

If you answered “yes”, please enter the names or links to the initiatives

1000 character(s) maximum
I22. Circular economy aspects are increasingly being introduced into ecodesign regulations for different products. To what extent would you support that the following circular economy requirements for solid fuel local space heaters are introduced in future regulatory reviews?

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Strongly against</th>
<th>Against</th>
<th>Neutral opinion</th>
<th>Supportive</th>
<th>Strongly supportive</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mandatory availability of spare parts for 10 years</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>Access to repair and maintenance information</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>Reparability score on the basis of the weighted average of a number of aspects such as the disassembly steps, the need of specific tools for assembly /disassembly or the use of removable/ reusable fasteners</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
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<td>○</td>
</tr>
<tr>
<td>Minimum recycled content (eg making mandatory the recyclability of around 90% of the product)</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
</tbody>
</table>
Would you suggest modifications to the aspects included in the table or including new ones?

1000 character(s) maximum

I23. One method to decrease pollutant emissions is to apply a post-combustion treatment by means of e.g a mechanical or electrostatic particle filter. Have you installed any of the following equipment to reduce pollutant emissions from solid fuel local space heaters (or install any of these appliances with any of these ancillary products already included)?

- Electrostatic precipitator
- Cyclonic separator
- Ceramic filter
- Catalyst
- Flue gas extraction fan
- Automatic combustion air flow controls

Please add some more details about how commonly these ancillary products are used and how they affect the overall cost:

1000 character(s) maximum

I24. Please feel free to add any further comments or reflections about solid fuel local space heaters

1000 character(s) maximum

Manufacturer questionnaire

M1. In which countries does your company manufacture solid fuel local space heaters?

1000 character(s) maximum

M2. On the market of which countries does your company place solid fuel local space heaters?
M3. Which types of solid fuel local space heaters does your company manufacture?

- Stoves < 15 kW nominal heat output
- Stoves between 15 to 50kW nominal heat output
- Cookers

If you chose “stoves”, please answer questions M4 to M9 and M15 to M29. If you chose “cookers”, please answer questions M10 to M14 and M15 to M29. Questions M15 to M29 are common to both categories.

**STOVES**

M4. What is the typical lifetime range of solid fuel stoves? (in years)

50 character(s) maximum

M5. How have your company production volumes evolved since 2015 on the basis of the fuel used?

1000 character(s) maximum
M6. Please select your company's sales percentages on the basis of the solid fuel used: (Answers should balance out to sum up to around 100%) (in case of stoves able to use several types of fuels, please choose only the preferred one, as declared by the manufacturer)

<table>
<thead>
<tr>
<th>Fuel Type</th>
<th>None (None)</th>
<th>Very low share (&lt; 10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
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<th>Dominant share (&gt;90%)</th>
</tr>
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<tbody>
<tr>
<td>Wood log</td>
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<td>☐</td>
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<td>☐</td>
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<td>☐</td>
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<tr>
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<td>Fossil fuel (e.g. coal)</td>
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<tr>
<td>Other types of solid fuel (e. g. charcoal)</td>
<td>☐</td>
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</tr>
</tbody>
</table>
M7. Please select your company's production percentage regarding the type of installation: (Answers should balance out to sum up to around 100%)

<table>
<thead>
<tr>
<th></th>
<th>None</th>
<th>Very low share (&lt; 10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Inset, open fronted</td>
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</tbody>
</table>
M8. What is the typical production cost range of solid fuel stoves, in €?

50 character(s) maximum

M9. What is the typical installation cost range of solid fuel stoves, in €?

50 character(s) maximum

COOKERS

M10. What is the typical lifetime range of solid fuel cookers, in years?

50 character(s) maximum

M11. How have your company’s production volumes evolved since 2015 regarding the fuel used?

1000 character(s) maximum
M12. Please select your company's production percentage of cookers on the basis of the fuel used: (Answers should balance out to sum up to around 100%) *(in case of cookers able to use several types of fuels, please choose only the preferred one, as declared by the manufacturer)

<table>
<thead>
<tr>
<th>Fuel Type</th>
<th>None</th>
<th>Very low share (&lt; 10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
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<th>Dominant share (&gt;90%)</th>
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<tbody>
<tr>
<td>Wood log</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wood briquettes</td>
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<td></td>
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<tr>
<td>Wood pellets</td>
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</tr>
<tr>
<td>Fossil fuel (e.g. coal)</td>
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<td></td>
</tr>
<tr>
<td>Other types of solid fuel (e.g. charcoal)</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
M13. What is the typical production cost range of solid fuel cookers, in €?

50 character(s) maximum

M14. What is the typical installation cost range of solid fuel cookers, in €?

50 character(s) maximum

COMMON SECTION TO STOVES AND COOKERS

M15. To what extent do you agree with the following statements regarding Regulation (EU) 2015/1185?

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly against</th>
<th>Against</th>
<th>Neutral opinion</th>
<th>Supportive</th>
<th>Strongly supportive</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>It has helped improve energy efficiency of solid fuel local space heaters</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>It has helped reduce pollutant emissions from solid fuel local space heaters</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>It has increased the cost of solid fuel local space heaters</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

M16. The minimum ecodesign requirements for solid fuel local space heaters are set out in Annex II to Regulation (EU) 2015/1185. Please provide your opinion about these limits and whether you think they should be made more stringent in the future

1000 character(s) maximum

M17. Which technological improvements developed over the last years would support raising the minimum energy efficiency performance thresholds?

1000 character(s) maximum

M18. Which technological improvements developed over the last few years would support the introduction of stricter limits for pollutant emissions?

1000 character(s) maximum
M19. One method to decrease pollutant emissions is to apply a post-combustion treatment by means of e.g. a mechanical or electrostatic particle filter. Do you produce any of the following equipment to reduce pollutant emissions from solid fuel local space heaters (or heaters with any of these ancillary products already included)?

- Electrostatic precipitator
- Cyclonic separator
- Ceramic filter
- Catalyst
- Flue gas extraction fan
- Automatic combustion air flow controls

**Equipment not mentioned above**

1000 character(s) maximum

Please add some more details about how common these ancillary products are used and how they increase the overall cost:

1000 character(s) maximum
M20. How big a share of the solid fuel local space heaters is produced with post-combustion equipment?

<table>
<thead>
<tr>
<th>Share</th>
<th>None</th>
<th>Very low share (&lt; 10%)</th>
<th>Low share (10-30%)</th>
<th>Medium share (30-50%)</th>
<th>High share (50-70%)</th>
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<th>Dominant share (&gt;90%)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>![None]</td>
<td>![Very low share (&lt; 10%)]</td>
<td>![Low share (10-30%)]</td>
<td>![Medium share (30-50%)]</td>
<td>![High share (50-70%)]</td>
<td>![Very high share (70-90%)]</td>
<td>![Dominant share (&gt;90%)]</td>
</tr>
</tbody>
</table>
M21. Apart from the pollutants already regulated, should new pollutants be included in the revision of Regulation (EU) 2015/1185?

- Yes
- No
- No opinion

Please explain your choice. If you chose “yes”, what new pollutants should be included in the Regulation and why?

1000 character(s) maximum

M22. Current ecodesign rules cover particulate matter (PM) as a whole, rather than specifying any particular fractions. Finer PM fractions (PM2.5 and smaller) are known to have the greatest health impacts. Should the current requirements for PM emissions be revised?

- Yes, by differentiating particles by size (PM10, PM2.5 and ultrafine particles) in the technical information of the product
- Yes, by setting mandatory limits to particulate matter depending on its size (PM10, PM2.5 and ultrafine particles)
- Yes, but none of the two options above are adequate
- No
- No opinion

Please explain your choice

1000 character(s) maximum

M23. How has Regulation (EU) 2015/1185 impacted your company’s product portfolio since 2015?

<table>
<thead>
<tr>
<th>Minor changes to existing products due to ecodesign</th>
<th>None of our products</th>
<th>Less than 10 % of our product portfolio</th>
<th>10 - 25 % of our product portfolio</th>
<th>More than 25 % of our product portfolio</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major redesigns were conducted due to ecodesign</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### M24. Are you aware of any regional or national initiatives that promote or restrict the installation and/or use of solid fuel local space heaters?

- [ ] Yes
- [ ] No

Please enter the names or links to the initiatives

1000 character(s) maximum
M25. Are you able to provide any information about the costs of testing and the methods used?

<table>
<thead>
<tr>
<th>Cost per product tested (in EUR and excluding taxes and shipping)</th>
<th>PM test (method used)</th>
<th>Any other comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inset appliances as per EN 13229</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Freestanding roomheaters/stoves as per EN 13240</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pellet stoves as per EN 14785</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slow heat release masonry heaters/stoves as per EN 15250</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
M26. Have you ever tested any solid fuel local space heater at partial load?

- Yes
- No

M27. If the answer to M26 is “yes”, please state the approximate share of appliances that are tested at partial load and at what partial load they are tested (as % of full or nominal load)

1000 character(s) maximum
M28. Circular economy aspects are increasingly being introduced into ecodesign regulations for different products. To what extent would you support that the following circular economy requirements for solid fuel local space heaters are introduced in future regulatory reviews?

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Strongly against</th>
<th>Against</th>
<th>Neutral opinion</th>
<th>Supportive</th>
<th>Strongly supportive</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mandatory availability of spare parts for 10 years</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Access to repair and maintenance information</td>
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<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Reparability score on the basis of the weighted average of a number of aspects such as the disassembly steps, the need of specific tools for assembly/disassembly or the use of removable/reusable fasteners</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Minimum recycled content (eg making mandatory the recyclability of around 90% of the product)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>
Would you suggest modifications to the aspects included in the table or including new ones?

1000 character(s) maximum

M29. Please feel free to add any further comments or reflections about solid fuel local space heaters

1000 character(s) maximum

NGO/General public questionnaire

N1. Please choose the option that best reflects your respondent category

- Individual not owner of a solid fuel local space heater
- NGO
- Other

N2. Are you concerned about the potential effect of solid fuel local space heaters on air quality in your area?

- Yes
- No
- No opinion

Please explain your choice

1000 character(s) maximum

Scientific literature shows that there is no evidence of a safe level of air pollution. Therefore, any regulation must strive to achieve the highest air quality standards, while safeguarding public health comprehensively. Meanwhile, pollutant emissions from the buildings sector are largely unknown to the public and often only minimally considered in sectoral policies, despite their significant contribution to poor air quality in Europe. For example, Europe’s air quality status 2023 report by the EEA recognises solid fuel burning as the main source of PM10 and as one of the top three sources of PM2.5 respectively. Epidemiological studies point to causal links between PM and asthma in children and adults, acute lower respiratory infections in young children, chronic obstructive pulmonary disease (COPD), ischemic heart diseases, and diabetes in adults, and development of cataracts in women. Links between lung cancer and inhalation of biomass combustion products have also been found.

N3. How supportive are you of having EU regulations that:

<table>
<thead>
<tr>
<th>Strongly against</th>
<th>Against</th>
<th>Neutral opinion</th>
<th>Supportive</th>
<th>Strongly supportive</th>
<th>No opinion</th>
</tr>
</thead>
</table>

60
| ...set minimum energy efficiency requirements for solid local space heaters on the EU market |   |   |   |   |   |   |
| ...set maximum limits for pollutant emissions from solid fuel local space heaters on the EU market |   |   |   |   |   |   |

N4. Should the minimum energy efficiency performance requirements set out in Regulation (EU) 2015/1185 be more ambitious?

- Yes
- No
- No opinion

Please explain your choice. If you chose yes, could you suggest what the new value(s) should be?

1000 character(s) maximum

N5. Are you aware of technological improvements developed over the last years that would support raising the minimum energy efficiency performance thresholds?

1000 character(s) maximum

N6. Are you concerned about the potential effect of solid fuel local space heaters on air quality in your area?

- Yes
- No
- No opinion

Please explain why

1000 character(s) maximum

Scientific literature shows that there is no evidence of a safe level of air pollution. Therefore, any regulation must strive to achieve the highest air quality standards, while safeguarding public health comprehensively. Meanwhile, pollutant emissions from the buildings sector are largely unknown to the public and often only minimally considered in sectoral policies, despite their significant contribution to poor air quality in Europe. For example, Europe’s air quality status 2023 report by the EEA recognises solid fuel burning as the main source of PM10 and as one of the top three sources of PM2.5 respectively. Epidemiological studies point to causal links between PM and asthma in children and adults, acute lower respiratory infections in young children, chronic obstructive pulmonary disease (COPD), ischemic heart diseases, and diabetes in adults,
and development of cataracts in women. Links between lung cancer and inhalation of biomass combustion products have also been found.

N7. Should the requirements on pollutant emissions set out in Regulation (EU) 2015/1185 be more ambitious?

☐ Yes
☐ No
☐ No opinion

Please explain your choice. If you chose yes, could you suggest what the new value(s) should be?

1000 character(s) maximum

Scientific literature shows that there is no evidence of a safe level of air pollution. Therefore, any regulation must strive to achieve the highest air quality standards, while safeguarding public health comprehensively.

N8. Are you aware of technological improvements developed over the last years that would support lowering the pollutant emission limits?

1000 character(s) maximum

N9. Apart from the pollutants already regulated, should new pollutants be included in the revision of Regulation (EU) 2015/1185?

☐ Yes
☐ No
☐ No opinion

Please explain your choice. If you chose “yes”, what new pollutants should be included in the Regulation and why?

1000 character(s) maximum

New pollutants could include black carbon and ultrafine particles, as pollutants of emerging and raising concern in the health community.

N10. Current ecodesign rules cover particulate matter (PM) as a whole, rather than specifying any particular fractions. Finer PM fractions (PM2.5 and smaller) are known to have the greatest health impacts. Should the current requirements for PM emissions be revised?

☐ Yes, by differentiating particles by size (PM10, PM2.5 and ultrafine particles) in the technical information of the product
Yes, by setting mandatory limits to particulate matter depending on its size (PM10, PM2.5 and ultrafine particles)
• Yes, but none of the two options above are adequate
• No
• No opinion

Please explain your choice. (e.g. if sufficient measurement approaches exist and are precise enough to allow the setting of requirements

1000 character(s) maximum

This is the science- and evidence-based policy option, as the WHO Air Quality Guidelines set different limit values for PM10 and PM2.5

N11. Are you aware of any regional or national initiatives that promote or restrict the installation and/or use of solid fuel local space heaters?

• Yes
• No

Please enter the names or links to the initiatives

1000 character(s) maximum
N12. Circular economy aspects are increasingly being introduced into ecodesign regulations for different products. To what extent would you support that the following circular economy requirements for solid fuel local space heaters are introduced in future regulatory reviews?

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Strongly against</th>
<th>Against</th>
<th>Neutral opinion</th>
<th>Supportive</th>
<th>Strongly supportive</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mandatory availability of spare parts for 10 years</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Access to repair and maintenance information</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Reparability score on the basis of the weighted average of a number of aspects such as the disassembly steps, the need of specific tools for assembly /disassembly or the use of removable/ reusable fasteners</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Minimum recycled content (e.g., making mandatory the recyclability of around 90% of the product)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>
Would you suggest modifications to the aspects included in the table or including new ones?

N13. Please feel free to add any further comments or reflections about solid fuel local space heaters

In addition to fuel and appliance changes, ringfencing adequate funding, especially for vulnerable and marginalised population groups, is essential to enable a fair transition and address existing health inequities. Additionally, if conceived and funded in an equitable way, renovations represent an opportunity to improve people’s lives in a very concrete way; better outdoor air quality by phasing out polluting energy sources, lower energy bills as a result of increased efficiency, and increased health and wellbeing, including through more stable and healthier indoor air and temperatures

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