

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

Fields marked with \* are mandatory.

## Introduction

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### **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.

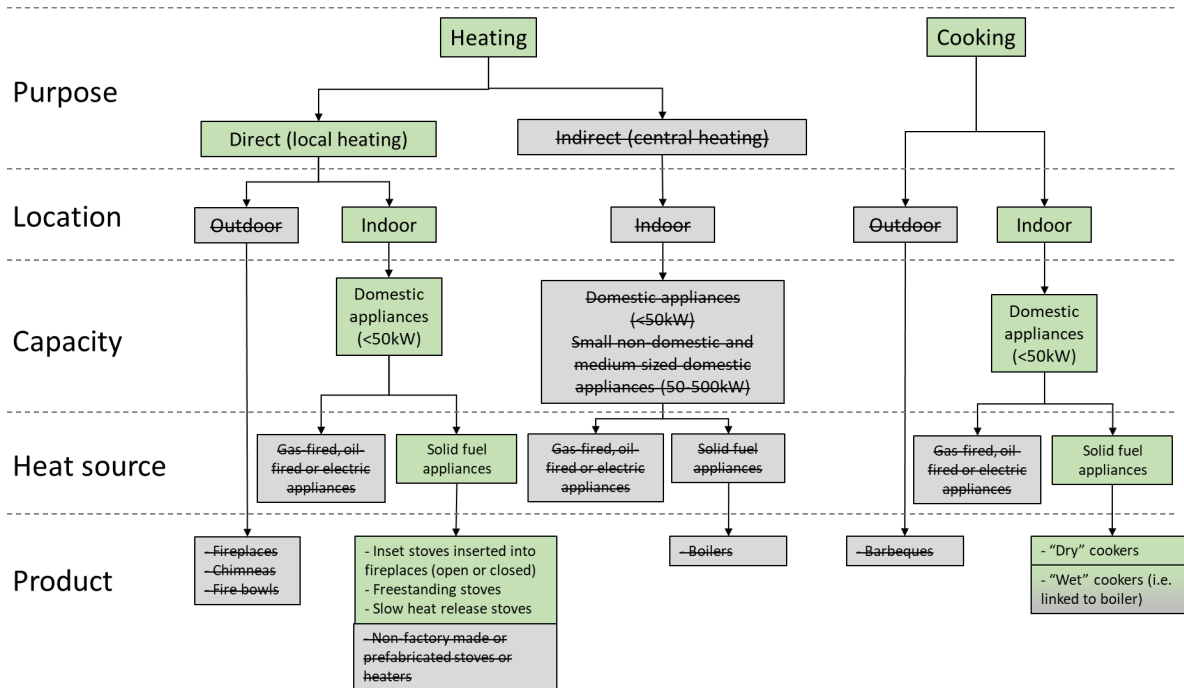
#### How can I participate?

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

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\* 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

*255 character(s) maximum*

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

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

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

- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena  
Ascension and  
Tristan da Cunha
- Saint Kitts and  
Nevis
- Saint Lucia
- United States  
Minor Outlying  
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and  
Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

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](#)

## User questionnaire

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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



- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- Non-EU

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 €?

	Purchase cost	Installation cost	Total cost (purchase + installation)
Cost in €			

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?

	Very rarely (once a month or less)	Rarely (between two and four times a month)	Regularly (two to three times per week)	Very often (every day for four hours or less)	Prolonged (more than four hours per day)
In autumn	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In winter	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In spring	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In summer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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)?

- Open-fronted
- Closed-fronted

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 €?

	Purchase cost	Installation cost	Total cost (purchase + installation)
Cost in €			



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?

	Very rarely (e.g. < 1 a month)	Rarely (e. g. < 1 a week)	Regularly (e.g. several times per week)	Very often (e.g. < every day for a limited time)	Prolonged (e. g. >4 hours per day)
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In autumn	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In winter	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In spring	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In summer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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?

	Very important	Somewhat important	Not important	No opinion
Better energy efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lower price	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lower emission of pollutants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Potential to use local fuels and to replace gas and electricity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lower CO2 emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

	Strongly against	Against	Neutral opinion	Supportive	Strongly supportive	No opinion
...set minimum energy efficiency requirements for solid local space heaters on the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

...set maximum limits for pollutant emissions from solid fuel local space heaters on the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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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?

	Strongly against	Against	Neutral opinion	Supportive	Strongly supportive	No opinion
Mandatory availability of spare parts for 10 years	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to repair and maintenance information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum recycled content (eg making mandatory the recyclability of around 90% of the product)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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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)

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Wood log	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood briquettes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood pellets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fossil fuel (e.g. coal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other types of solid fuel (e.g. charcoal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



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%)

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Inset, open fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inset, closed-fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Freestanding , open-fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Freestanding, closed-fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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)

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Wood log	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood briquettes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood pellets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fossil fuel (e.g. coal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other types of solid fuel (e.g. charcoal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**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)

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Wood log	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood briquettes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood pellets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fossil fuel (e.g. coal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other types of solid fuel (e.g. charcoal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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)

	Very important	Somewhat important	Not important	No opinion
Better energy efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lower price	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lower emission of pollutants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Potential to use local fuels and to replace gas and electricity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lower CO2 emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

	Strongly against	Against	Neutral opinion	Supportive	Strongly supportive	No opinion
...set minimum energy efficiency requirements for solid local space heaters on the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
...set maximum limits for pollutant emissions from solid fuel local space heaters on the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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?

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Share	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

R25. By how much, in €, does the price of the solid fuel local space heater increase when incorporating such equipment?

*1000 character(s) maximum*

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?

*1000 character(s) maximum*

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

*1000 character(s) maximum*

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?

	Strongly against	Against	Neutral opinion	Supportive	Strongly supportive	No opinion
Mandatory availability of spare parts for 10 years	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to repair and maintenance information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum recycled content (eg making mandatory the recyclability of around 90% of the product)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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



16. 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)

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Wood log	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood briquettes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood pellets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fossil fuel (e.g. coal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other types of solid fuel (e.g. charcoal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

17. 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%)

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Inset, open fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inset, closed-fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Freestanding , open-fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Freestanding, closed-fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



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:

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Wood log	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood briquettes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood pellets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fossil fuel (e.g. coal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other types of solid fuel (e.g. charcoal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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?

	Strongly against	Against	Neutral opinion	Supportive	Strongly supportive	No opinion
Mandatory availability of spare parts for 10 years	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to repair and maintenance information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum recycled content (eg making mandatory the recyclability of around 90% of the product)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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?

1000 character(s) maximum

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)

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Wood log	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood briquettes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood pellets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fossil fuel (e.g. coal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other types of solid fuel (e.g. charcoal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



M7. Please select your company's production percentage regarding the type of installation: (Answers should balance out to sum up to around 100%)

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Inset, open fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inset, closed-fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Freestanding , open-fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Freestanding, closed-fronted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**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)

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Wood log	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood briquettes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood pellets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fossil fuel (e.g. coal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other types of solid fuel (e.g. charcoal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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?

	Strongly against	Against	Neutral opinion	Supportive	Strongly supportive	No opinion
It has helped improve energy efficiency of solid fuel local space heaters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It has helped reduce pollutant emissions from solid fuel local space heaters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It has increased the cost of solid fuel local space heaters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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?

	None	Very low share (< 10%)	Low share (10-30%)	Medium share (30-50%)	High share (50-70%)	Very high share (70-90%)	Dominant share (>90%)
Share	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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?

	None of our products	Less than 10 % of our product portfolio	10 - 25 % of our product portfolio	More than 25 % of our product portfolio	No opinion
Minor changes to existing products due to ecodesign	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Major redesigns were conducted due to ecodesign	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Changes (minor or major) were made due to normal marketing strategies, independently of ecodesign	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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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?

	Cost per product tested (in EUR and excluding taxes and shipping)	PM test (method used)	Any other comments
Inset appliances as per EN 13229			
Freestanding roomheaters/stoves as per EN 13240			
Pellet stoves as per EN 14785			
Slow heat release masonry heaters /stoves as per EN 15250			

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?

	Strongly against	Against	Neutral opinion	Supportive	Strongly supportive	No opinion
Mandatory availability of spare parts for 10 years	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to repair and maintenance information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum recycled content (eg making mandatory the recyclability of around 90% of the product)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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:

	Strongly against	Against	Neutral opinion	Supportive	Strongly supportive	No opinion

...set minimum energy efficiency requirements for solid local space heaters on the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
...set maximum limits for pollutant emissions from solid fuel local space heaters on the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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?

	Strongly against	Against	Neutral opinion	Supportive	Strongly supportive	No opinion
Mandatory availability of spare parts for 10 years	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to repair and maintenance information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum recycled content (eg making mandatory the recyclability of around 90% of the product)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Would you suggest modifications to the aspects included in the table or including new ones?

*1000 character(s) maximum*

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

*1000 character(s) maximum*

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

## **Contact**

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