

SBBA - Swedish Heating Boilers and Burners Association, is the Swedish industry association for manufacturers and suppliers of boilers, water heaters and burners and related products and services. SBBA is a member of the European sectoral committee for burners and boilers in EHI, (European Heating Industry) for more information on SBBA see: www.sbba.se

Do Swedish authorities want to prohibit the use of solid biofuels?

The Swedish industry association SBBA has attended Energy Agency industry meetings on Ecodesign regarding lot 15, solid fuel boilers.

We understand that the question after the meeting is prepared in a common group of The Swedish National Board of Housing, Building and Planning, the Swedish Energy Agency and the Swedish Environmental Protection Agency who then reports to the Cabinet Office, which formally decides Sweden's position on the issue.

SBBA want this letter to draw your attention on the producers' perspective, because we feel that the position from the industry are not sufficiently addressed in previous consultation rounds, and we feel that some of the Swedish authorities represent a perspective on this issue that does not represent the position on the Swedish market.

SBBA:s position:

- SBBA consider the proposal to be so tough as to impair the conditions of competition for solid biofuel boilers so much that it harms the Swedish market for these products.
- SBBA believe that the studies that form the basis for the proposal has taken too much impression of the markets that had very different market conditions than the Swedish market. In certain regions of Germany, it has been up to about 5000 Euros in state aid to install a solid fuel boiler. There are products manufactured by Swedish producers meet the German demands, but these products are considered extreme premium products and has no market in Sweden today. The Swedish position on this issue must be based on conditions on the Swedish market!
- SBBA see big problems with being able to conduct an effective oversight role as emission standards are at a lower level than the differences between different test institutes. The proposal puts the tests at a level where there are no established methods for measuring today. Even with today's levels the industry experienced major problems with various measurement results from different test institutes in different countries, and according to the new proposal, the problems will increase drastically.
- SBBA consider it important to stress market and instruments perspective. Previously Swedish government seen solid biofuels as a good way to reduce dependence on electricity, and reduce dependence on fossil fuels, but now do an about-face that confuses consumers, perpetuating dependence on electricity and major costs for companies. SBBA want to see a long-term approach in the use of instruments.
- SBBA believe that EU lost the purpose of Ecodesign directive. The initial idea was that the least energy-efficient products within a product category would be banned, and by including labeling consumers would be guided to choose energy-efficient alternatives. Under the current proposal it would instead ban all existing products in this product category.
- Fossil-fired solid fuel products allowed under the proposal have twice the allowed emissions for particulate matter (40mg/20mg) as renewable, which is absurd from a Swedish perspective.

The use of BAT as a basis for lot 15 has major implications

The previously posted suggestions for lot 15, solid fuel boilers have assumed existing measurement methods used in accordance with EN 303-5:2012, ie the current European standard for testing of boilers for solid fuels. The new proposed based on the levels of German law, claims by 2014. This means that the requirements have been set at a level that ensures that no country should be forced to lower their standards compared to their existing national laws. The application of this reasoning has the following consequences for the Swedish market:

- You put the test at a level that there are no methods to measure today.
- No Swedish-produced wood boiler sold on the Swedish market today that does not have lambda control will be allowed under the proposal. Lambda control system increases the price drastically. The price to the consumer for a wood boiler will roughly double.
- Almost all Swedish-made pellet boilers in the Swedish market today will be banned. The price to the consumer for a pellet boiler will increase by up to approximately 50%.

The proposal is a turnaround on attitude to renewable solid biofuels

SBBA understand that the Swedish government had previously welcomed the increasing use of solid renewable biofuels as part of reducing reliance on electricity and fossil fuel dependency. The current proposal will considerably impair the conditions for product groups pellet boilers and wood boilers. SBBA welcomes strict requirements on emissions and efficiency for solid fuel boilers, and SBBA welcomes the greening of the warming of buildings. In the current proposal, however, this effort has gone so far as to prohibit a range of excellent products available on the Swedish market today. This comprises products that are an important part of the transition for reduced dependency on fossil fuels and reduced dependence on electricity.

In many situations, the wood boiler and the peat boiler are excellent alternatives to heat pumps, fossil fuel-fired boilers and district heating. It is a realistic option as long as they have a competitive price. With new technologies, we can improve our products, but the price tag is too high, then the market for products that die out. The current proposal will have such an impact on the price tag for these product categories that it will have significant market consequences.

You are welcome to look at the modern products SBBA's member companies provide on the Swedish market. This is, in many cases, products with low emissions and high efficiency. These products will be prohibited under the proposal.

For consumers, the proposal means in turn that these product categories will be replaced with more expensive products. The consumer has not been given the opportunity to consider the impact of this, but it will come as a surprise that the boiler suddenly costing another 50% of the price.

If the ambition of the Swedish authorities is to prohibit solid biofuel boilers in general, this should be clearly communicated. The signals we have received from the government until today have pointed out solid biofuels as a good alternative in the quest to reduce dependency on electricity and fossil fuel, and many would be surprised by this U-turn.

Is it the Swedish authorities' intention to ban the excellent products available on the market in the product segment solid biofuel boilers?