

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

No boilers tested meet the proposed requirements!

During the spring of 2014, the Swedish Energy Agency has taken the initiative to making SP (Technical Research Institute of Sweden) conduct independent tests of a variety of wood-fired boilers and pellet boilers for houses. The Agency notes that " by purchasing a new wood boiler with storage tank can save 40 percent of wood consumption while reducing environmental emissions " and that " the most efficient pellet boiler in the test can reduce the pellet consumption by up to 16 percent per year while reducing environmental emissions. "

SBBA think it is very positive that the Swedish Energy Agency took the initiative to do the testing, and it is commendable that highlights these forms of heating are excellent both in terms of efficiency, and environmental performance. However, the test results should also be considered in as a key input in the discussion of Ecodesign requirements within LOT 15 over several years.

SBBA can conclude that based on SP's testing of a selection of boilers on the European market is the result that **none of the boilers tested passed the proposed requirements for Ecodesign lot 15**. The test also includes some advanced models with the most advanced cleaning technology in the premium segment.

Energy Agency tests of pellet boilers and wood boilers 2013/2014:

| boiler | Efficiency % | CO mg/m ³ at 10 % O ₂ | OGC mg/m ³ at 10 % O ₂ | NOx mg/m ³ at 10 % O ₂ | PM mg/m ³ at 10 % O ₂ | Emission requirements EN 303-5:2012 |
|--------|--------------|---|--|--|---|-------------------------------------|
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Pellet boilers:

| | | | | | | |
|------------------|----|------|----|-----|-----|---------|
| Pellet boiler 1 | 72 | 580 | 16 | 141 | 42 | Class 4 |
| Pellet boiler 2 | 72 | 1565 | 56 | 126 | 141 | Class 3 |
| Pellet boiler 3 | 71 | 1076 | 57 | 147 | 42 | Class 3 |
| Pellet boiler 4 | 74 | 26 | 2 | 140 | 17 | Class 5 |
| Pellet boiler 5 | 72 | 456 | 19 | 149 | 41 | Class 4 |
| Pellet boiler 6 | 63 | 1125 | 43 | 145 | 53 | Class 3 |
| Pellet boiler 7 | 71 | 161 | 3 | 152 | 39 | Class 5 |
| Pellet boiler 8 | 58 | 1353 | 24 | 136 | 81 | Class 3 |
| Pellet boiler 9 | 73 | 105 | 2 | 136 | 54 | Class 5 |
| Pellet boiler 10 | 68 | 435 | 12 | 145 | 98 | Class 5 |
| Pellet boiler 11 | 66 | 1595 | 14 | 137 | 27 | Class 3 |

Vedpannor:

| | | | | | | |
|---------------|----|------|-----|-----|----|-------------------|
| Wood boiler 1 | 73 | 2088 | 95 | 196 | 49 | Class 3 |
| Wood boiler 2 | 78 | 773 | 13 | 217 | 26 | Class 4 |
| Wood boiler 3 | 80 | 198 | 9 | 223 | 35 | Class 5 |
| Wood boiler 4 | 76 | 3789 | 341 | 161 | 30 | Not qual. Class 3 |
| Wood boiler 5 | 68 | 336 | 55 | 183 | 28 | Class 3 |
| Wood boiler 6 | 82 | 280 | 26 | 241 | 26 | Class 5 |
| Wood boiler 7 | 75 | 4482 | 462 | 158 | 65 | Not qual. Class 3 |
| Wood boiler 8 | 72 | 518 | 5 | 228 | 40 | Class 5 |
| Wood boiler 9 | 75 | 219 | 17 | 219 | 28 | Class 5 |

Green Marked fulfill the requirement in the proposed EcoDesign was presented in March 2014

Redzone manages NOT the requirement in the proposed EcoDesign was presented in March 2014

SBBA has previously indicated that the negotiation process within Lot 15 has been conducted without a sufficient factual basis. There are no standardized test methods for testing in accordance with the proposed requirements, and it is a flawed test data set to underpin the proposed requirement levels. SBBA has also suggested that a round robin test should be carried out to evaluate the repeatability of the proposed testing procedure, which we fear is not sufficient to support the proposed requirement levels.

The tests carried out on the initiative of STEM shows that the situation is worse than SBBA feared. **Not even premium products sold on the stimulated markets meet the requirements. SBBA fear that there are no available products that would meet the proposed requirements tested according to the test method used.**

The purpose of the Ecodesign directive is to ban the least energy-efficient products in each product category, not to ban entire product categories! It is important that these test results, and others are disseminated to decision-makers throughout the EU for the upcoming committee vote so that any decision in lot 15 will be based upon relevant information.

SBBA previously had objections to the special requirement levels (lower requirements regarding particulate emissions) for fossil fuel-fired boilers, and have since been told that "the Commission wants strict requirements, but not so severe that it means a total ban on fossil boilers," but these underwriting standards means that, in practice, an outright ban on biofuel boilers. SBBA want the decision makers in Europe to consider this information so that they do not take an unsubstantiated decision that involve a significant environmental deterioration of Europe. **SBBA supports strict requirements for boilers, but not as strict as that the whole product category is prohibited!**

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