

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

SBBA wants tough requirements while maintaining cost levels

SBBA generally welcomes strict requirements on emissions and efficiency for solid fuel boilers. Partly because SBBA welcomes the greening of the warming of the property portfolio, and partly because we see that the products on the Swedish market is of high international standard, both technically and qualitatively. However, consider SBBA that the proposed requirements under LOT 15/2009/125/EC are so sharp that they will have negative consequences for market solid fuel boilers.

If the intention of the legislature is to influence product offerings so that solid fuel boilers in the future will be a more expensive product and thus have a reduced market so forced the industry to accept this, but we see that there is a risk that impact the investigation took too big impression by some national markets who made themselves dependent on government support for solid fuel boilers, and thus made a false picture of the overall industry situation leading to erroneous conclusions about how the industry will be affected by the new rules. State described in the impact study is not consistent with the position in the Swedish market for solid fuel boilers.

In this context it is important to see the proposed rules for solid fuel boilers in relation to the requirements set up for heat pumps, boilers, and other technology solutions under LOT 1. SBBA believes that the new proposal might result in solid fuel boilers are more expensive in relation to other technology solutions and thus will lose market share to them.

The basis for the feasibility study is inadequate

The pre-study noted several inaccuracies regarding how "typical equipment" in the category of solid fuel boilers looks, both in terms of performance for the best available equipment (BAT), and partly for that it is possible to achieve Ecodesign requirements without significant cost increases. The typical hand-fired boiler in the EU has neither the particulate filter, catalytic converter with lambda control or flue. It also makes the mistake of grouping automatic pellet boilers and hand fed wood boilers together.

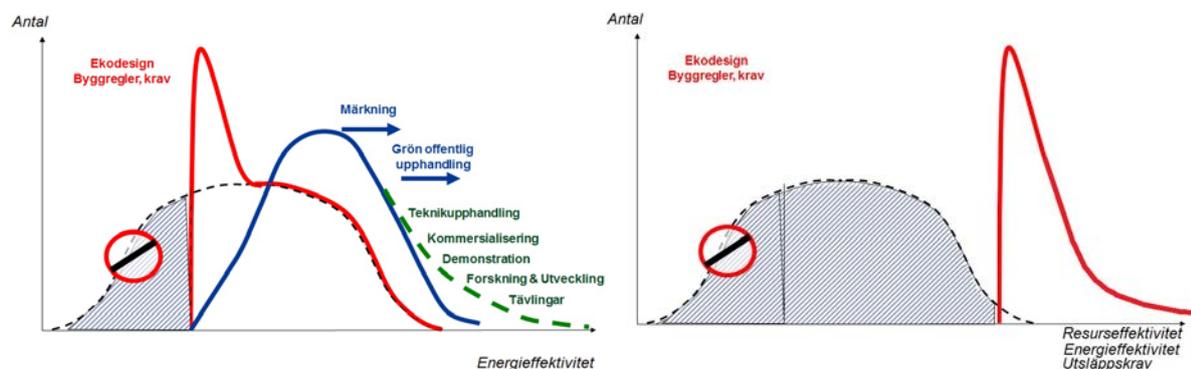
The pre-study gets too much input from some specific national markets where the industry is dependent on the targeted funding been given to stimulate the market for solid fuel boilers. The specified "average product" represents an extreme premium product that currently does not exist in the Swedish market, nor many of the other national markets within the EU.

BAT values in the report are taken from different products that can be measured at various test institutes with different fuels and different conditions. This means that it is not possible to produce a commercial product with these values because the design must strike a balance between different parameters. This gives a false impression of how the best product on the market looks like.

To meet the specified emission limits required the addition of particulate filters, catalytic converter with lambda control and flue gas condensation. The new rules inevitably lead to large cost increases for hand fed solid fuel boilers. A catalyst with lambda control costs around 1500 Euro, a flue gas additive approx 1000 Euro and a particulate filter approx. 1000 Euro.

The Ecodesign requirements forbid all products on the market

Instead of taking away the least efficient percentile of the product category from the market and guide consumers to the best, the new requirement levels away the vast majority of product from the market, and require expensive product development to meet the new levels. (see figure)



The new requirements will lead to almost all products in the market have to be remodeled to meet the new requirements. Is this the intention of the legislature?

The uncertainty of the current measurement methods

The reduced emission limits places increased demands on the reliability of the measurements. Measurement errors of today's measurement methods may be at an increased reduction effect on the result. In connection with its intention to tighten emission levels should therefore ensure that there are methods that are able to meet the new requirement levels. SBBA believe that the measurement methods according to existing standards NOT live up to the increasing demands.

Fuel effects on emissions

Emissions are strongly dependent on the fuel and may vary widely with wood, humidity, fuel structure and many other parameters. This wide variety of factors that the tests be random and difficult to reconstruct. To reduce fuel election impact test result requires that the fuel characteristics can be described more clearly and that the fuel is of very uniform quality.

The difference between the various test centers

In addition to measurement error, there is a big difference in test results between different test centers. A monitoring process that meets the requirements of the new eco-design rules require that tests of the various test institutes are repeatable, and provides the same result at different laboratories. This requires high demands on qualification procedures of test institutes. SBBA believe that today there are too big differences between the test institutes to meet the increasing demand.

The effect of this new policy instrument

SBBA believe that solid fuel boilers is an environmentally good alternative for building heating, and is a higher proportion of heating with solid biofuels. SBBA hope that the Commission shares this view and are designed to guide consumers in Europe to reduce the environmental impact of the warming of the property portfolio, and a higher proportion of real estate heated with solid biofuels.