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AEGPL Position Paper on Eco-design of Boilers

AEGPL, the European LPG Association, wishes to reiterate its strong support for the EU's efforts to enhance the efficiency and overall performance of boilers throughout the European Union. Given the significant share of heating in total energy consumption in Europe and the obvious benefits in terms of supply security and sustainability, the need to pursue a high level of performance in this sector is clear. The revised Commission working document on possible eco-design requirements for boilers, as published in June 2009, provides a useful basis for discussion of this important issue.

With a view to ensuring that the final version of the planned implementing measure is both effective and consistent with the letter and spirit of the parent Eco-design Directive (EC/2005/32), our industry wishes to put forward a series of proposals and reflections in the lead-up to the Consultation Forum meeting of 24-25 June, 2009.

Appropriate NOx limits:

- AEGPL supports the Commission's initiative to adjust the minimum NOx emission limits as compared to the previous draft text. However, we regret the fact **the proposed 42% increase for the limit for gas-fired boilers (50 mg/kWh rather than 35) is proportionately less than the 50% increase proposed for their oil-fired equivalents (105 mg/kWh rather than 70)**. Moreover, no justification for the differentiated implementation deadlines (January 2013 for gas boilers as opposed to January 2014 for oil boilers) is provided.

While we accept the notion that gaseous fuels can, as a result of their inherently cleaner combustion, achieve lower levels of emissions than liquid alternatives in absolute terms, the effort and costs associated with this sort of reduction are no less significant. We therefore submit that **any adjustment to the NOx limits and corresponding deadlines originally proposed by the Commission should be proportionally equal for both oil and gas-powered boilers.**

One energy, one label:

- Along with a long list of other stakeholders and numerous Member States, AEGPL wishes to reiterate its preference for a **specific labelling system for each fuel**. This will provide end-users and/or installers with a much clearer and simpler means of evaluating the various options available to them, allowing them to select the most efficient and appropriate option for their particular circumstances. The use of a 'one-size-fits-all' approach would invite distortions of the market by **generating unfair and often misleading comparisons**, often based on factors unrelated to the intrinsic performance of the boiler itself. Also in the interest of providing end-users with a clear framework for evaluating performance and identifying excellence, the labelling system should include **no more than one category above 'A', with 'A+' seeming to be the most appropriate option.**



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Realistic, yet ambitious efficiency standards:

- The proposed seasonal efficiency requirements - and more specifically, the timing of their introduction - are ambitious to the point that the boiler industry is consistently expressing serious doubts about their feasibility and the expected economic and social impact on end-users and businesses. **Article 15 of the eco-design Directive explicitly provides that implementing measures “shall have no significant negative impact” on either the cost of the products in question or the competitiveness of the associated sector.** As such, and in light of the challenging economic context, it might be appropriate to consider **adjusting the proposed efficiency requirements** and the timetable for their implementation.

The AEGPL looks forward to playing an active role in this process and is confident that this will lead to a final result that is both practicable and consistent with the EU's broader objective of increasing efficiency and moving towards a more sustainable energy model.

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