7th of May 2025

Subject: Joint statement to support an ambitious revision of the ecodesign regulations for solid fuel heating

In January 2025, the European Commission published a draft proposal for the revised ecodesign regulations for solid fuel local space heaters and solid fuel boilers. These regulations include both **energy efficiency and emission requirements for new appliances** that will be sold in the EU, without affecting the current stock installed in households.

The proposal includes provisions that would increase the energy efficiency of such products while decreasing the pollution from emissions[1]. However, before a stakeholder exchange could take place according to the regular legislative process, the draft was torpedoed due to pressure from some industry players and some Members of the European Parliament.

Arguments against the revision of the regulations overlook the benefits they would bring about, including healthier air, fewer climate-damaging emissions, faster electrification, and extensive savings on public health spending for Member States.

As a result, the **Consultation Forum planned for 12 February – the main meeting for stakeholder discussion – was cancelled.** This has put the regulatory process on hold and opens the door for possible watering down of the proposals.

We would like to draw your attention to the following points, which are needed for an ambitious revision:

- To protect people's health, the climate and our environment, it will be important for the EU to drastically reduce biomass burning. Where alternatives are not viable, stricter emission limit values in the ecodesign regulations for solid fuel appliances are **necessary to cut emissions** of the EU's main air pollutants, such as fine particulate matter (PM2.5), black carbon (BC), and benzo(a)pyrene, thus helping to achieve air quality and climate objectives the EU has set for itself. For instance:
    - Lower PM2.5 concentration in the air we breathe **could help avoiding 259,000 annual premature deaths in the EU and reduce morbidities** according to the latest report of the European Environment Agency, an amount equivalent to a city the size of Strasbourg lost every year. Vulnerable groups such as children, the elderly, pregnant women and unborn babies will in particular benefit from reduced emissions. Reduced PM2.5 and black carbon emissions are crucial to reach the expected new national emission goals for 2035 and 2040 in the new UN Gothenburg Protocol.
    - Lower BC emissions will not only **improve public health** but also mitigate near-term climate change, as it is a potent climate pollutant, and help prevent the irreversible melting of Arctic ice.

[1] Even though it does not include a mandatory particle filter (precipitator) for all appliances, which we consider essential.

- Stricter emission requirements would **promote the uptake of low-emission technologies** for heaters made in Europe, such as precipitators, automatic combustion controls, and catalytic converters. This would keep EU industry at the forefront of innovation in a competitive global market.
- Ambitious source-based emission standards in these ecodesign regulations are **crucial for meeting the mandatory targets** of the two pillars of existing EU clean air policy: the National Emission reduction Commitments Directive and the Ambient Air Quality Directive. This is especially needed as solid biomass burning is promoted as a renewable alternative in many Member States.
- Ambitious ecodesign requirements will not only reduce the impact of biomass burning but it will also be an indirect lever to make **favourable clean alternatives** like building insulation, heat pumps, and renewable-based district heating more attractive.
- Updated standards will also **help tackle the social impact of air pollution**: the quality of life of low-income households in particular would improve. These households deserve the same high-quality technologies as anyone else and should not be forced to trade health for heat. Stricter emission requirements, when coupled with adequate support measures to mitigate higher upfront and maintenance costs, to reduce long-term energy needs and to favour the uptake of pollution-free and climate neutral options, can contribute to a just transition for all and ensure that low-income households are not left behind.

We therefore call on Members of the European Parliament, EU Member States and the European Commission to:

- Resume the revision process without weakening the already proposed draft regulations.
- Support strict emission limit values aligned with the reduction potential of best available technologies (in particular: precipitators, automatic combustion controls, and catalytic converters) in the revised regulations.
- Support the inclusion of further pollutants in the revised regulations, such as black carbon and ultrafine particles, as well as provisions that bring test conditions for local space heaters closer to real-life operations, to prevent circumvention and deliver consumers the quality of the appliance they have paid for.

Yours sincerely,

Initiators:

Environmental Coalition on Standards (ECOS)

European Environmental Bureau (EEB)

Green Global Future (Denmark)

Deutsche Umwelthilfe (DUH, Environmental Action Germany)

Supporters:

AG Saubere Luft KLUG (Deutsche Allianz Klimawandel und Gesundheit e.V.) (Germany)

AirClim (Air Pollution & Climate Secretariat, Sweden)

Biofuelwatch

Bund für Umwelt und Naturschutz Deutschland e. V. (BUND, German Federation for the Environment and Nature Conservation)

BUND Naturschutz in Bayern e.V. (Germany)

CAN Europe

CIPRA - Association for protection of the Alps (Slovenia)

Doctors and Scientists Against Wood Smoke Pollution (DSAWSP)

Energy Agency of Plovdiv (Bulgaria)

European Clean Air Centre (ECAC, Poland)

European Respiratory Society (ERS)

FEANTSA (European Federation of National Organisations working with the Homeless)

FERN

Focus (Slovenia)

France Nature Environnement (FNE, France)

Frank Bold Poland

Fundacja na Rzecz Efektywnego Wykorzystania Energii (FEWE, Poland)

Habitat for Humanity Bulgaria

Health for Future Dresden (Germany)

Healthy Indoor Environment (Denmark)

Independent Health Insurance Funds (Mutualités Libres)

INFORSE-Europe

Kosovo Advocacy and Development Centre

Levegö Munkacsoport (Clean Air Action Group, Hungary)

Mums for Lungs (United Kingdom)

North-West Croatia Regional Energy Agency (REGEA, Croatia)

Polish Smog Alert

ROBIN WOOD e.V. (Germany)

Topten (topten.eu)

Za Zemiata (Friends of the Earth Bulgaria)

ZERO (Portugal)