



Guidelines accompanying

2017

Regulations (EU)
2015/1185, 1186 & 1188
with regard to **energy labelling**
and ecodesign requirements
for local space heaters



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1. Purpose of the guidelines and disclaimer

In 2015 the European Union published ecodesign and energy labelling regulations for local space heaters. These regulations establish minimum ecodesign requirements and an energy labelling scheme for the products in their scope.

These guidelines aim to help relevant stakeholders, including industry and public authorities, to implement the regulations. They summarise the most relevant information from the regulations to provide an introduction to the subject matter and answer the most common questions. The European Commission may in the future integrate these guidelines with further frequently asked question and answers, if deemed necessary.

These guidelines are intended to be used only for facilitating the implementation of the regulations. They are not intended to replace the regulations or to provide "interpretation" beyond their intent. This document reflects the opinion of the European Commission and does not provide a legally binding interpretation of the regulations. Only the European Court of Law can provide a legally binding interpretation of the EU legislation. The European Commission nor any person working on the European Commission's behalf may be held responsible for the use which may be made of the information contained therein.

Relevant parallel readings are:

1. Commission Notice – Blue Guide on the implementation of EU products rules (2016/C/272/01), whose information applies to all products on the single market.
2. The frequently asked questions and answers on ecodesign and energy labelling legislation that can be found on the website <https://ec.europa.eu/energy/en/topics/energy-efficiency/energy-efficient-products>

2. The Regulations and their scope

The European Union has adopted the following regulations concerning local space heaters:

- *Commission Regulation (EU) 2015/1188 of 28 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regards to ecodesign requirements for local space heaters¹*: covering domestic local space heaters with a nominal heat output up to 50kW and commercial local space heaters with a nominal heat output up to 120kW (with the exception of solid fuel local space heaters). Commercial local space heater means either a luminous local space heater or tube local space heater. Domestic local space heater means a local space heater other than a commercial one.
- *Commission Regulation (EU) 2015/1185 of 24 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regards to ecodesign requirements for solid fuel local space heaters²*: covering solid fuel local space heaters with a nominal heat output up to 50 kW.
- *Commission Delegated Regulation (EU) 2015/1186 of 24 April 2015 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regards to the energy labelling of local space heaters³*: covering local space heaters with a nominal heat output up to 50kW, including solid fuel local space heaters, but excluding, among others, electric local space heaters, luminous local space heaters and tube local space heaters.

The heaters that are in the scope of at least one of the regulations can be classified as follows:

- Gaseous fuel local space heaters
- Liquid fuel local space heaters
- Electric local space heaters
- Solid fuel local space heaters
- Solid fuel cookers

3. Environmental impacts

The preparatory study that the European Commission undertook in 2012 for ecodesign requirements for local space heaters⁴ identified and analysed their relevant environmental impacts.

As for most products subject to ecodesign regulations, the primary energy consumption during the use phase creates the main environmental impact via the related carbon dioxide emissions and has the most potential for improvement. Therefore, the regulatory measures focus on the use phase and, for ecodesign, also on the end-of-life phase. No specific requirements related to production or transport are established.

¹ OJ L 193, 21.7.2015, p. 76.

² OJ L 193, 21.7.2015, p. 1.

³ OJ L 193, 21.7.2015, p. 20.

⁴ Preparatory Study for Ecodesign Requirements of EuPs (III) ENER Lot 20 – Local Room Heating Products, 2012

Emissions from fuel combustion (e.g. NO_x, particulate matter, organic gaseous compounds and carbon monoxide) are also relevant for local space heaters with a burner. These emissions are not taken into account for electric local space heaters because these heaters do not directly produce this kind of emissions.

4. State of play of legislation

4.1. History of the legislation to date

From the start of the preparatory study in 2011 until the publication of the regulations in 2015, the process lasted 4 years.

4.2. Time table

- 21/07/2015: Publication of the three regulations in the Official Journal of the European Union
- 10/08/2015: Entry into force of the three regulations
- 01/01/2018:
 - Tier 1 ecodesign requirements in Commission Regulation (EU) 2015/1188 for local space heaters on energy efficiency and NO_x
 - Energy labelling in Commission Regulation (EU) 2015/1186 with a scale from A++ to G for all local space heaters except flueless heaters using solid fuels or open to chimney heaters using solid fuels
- 22/08/2018: Special revision on 3rd party certification for solid fuel local space heaters (Commission Regulation(EU) 2015/1185)
- 01/01/2019: Revision of ecodesign requirements for local space heaters, excluding solid fuel local space heaters (Commission Regulation(EU) 2015/1188)
- 01/01/2022:
 - Tier 1 requirements for solid fuel local space heaters space heaters on energy efficiency, NO_x, particulate matter (PM), carbon monoxide (CO) and organic gaseous compounds (OGC)
 - Energy labelling with a scale from A++ to G for flueless local space heaters using solid fuels and open to chimney local space heaters using solid fuels
- 02/08/2023: Revision of the regulation on energy labelling for local space heaters with a view to rescaling
- 01/01/2024: Revision of the ecodesign requirements for solid fuel local space heaters

4.3. Review

4.3.1. Commission Regulation (EU) 2015/1188 on ecodesign for local space heaters

A review of this regulation has to be presented to the consultation forum no later than 1/1/2019.

This review shall assess:

- The appropriateness of setting stricter requirements for energy efficiency and emissions of NO_x;

- The verification tolerances;
- The validity of the correction factors used for assessing the seasonal space heating energy efficiency of local space heaters;
- The appropriateness of introducing third party certification.

4.3.2. Commission Regulation (EU) 2015/1185 on ecodesign for solid fuel local space heaters

A special review to assess the appropriateness of introducing a 3rd party certification has to be presented to the consultation forum no later than 22/08/2018. A full review of the regulation has to be presented to the consultation forum no later than 1/1/2024.

This review shall assess:

- The appropriateness of setting stricter requirements for energy efficiency, NO_x, PM, CO and OGC;
- The verification tolerances.

4.3.3. Commission Regulation (EU) 2015/1186 on energy labelling for local space heaters

A review of this regulation was foreseen in 2024; however, with the publication of the new energy labelling framework⁵, this review has been moved forward. The rescaled A to G label has to be adopted by the Commission by 2/8/2023.

This review shall:

- Rescale the energy efficiency label;
- Assess whether the exemptions can be reduced.

5. Key requirements

5.1. Ecodesign requirements

The ecodesign requirements are divided in three categories: for energy efficiency, for emissions and for product information.

Requirements for energy efficiency

The seasonal space heating efficiency is the key parameter for all local space heaters.

Heating demand is not constant over the year. To reflect these seasonal differences, the part load behaviour is taken into account in the seasonal space heating energy efficiency for all commercial local space heaters (as defined in Article 2(6) of Commission Regulation (EU) 2015/1188), with the exception of electric commercial local space heaters. For all the other local space heaters (as defined in Commission Regulation (EU) 2015/1188 and Commission

⁵ Regulation (EU) 2017/1369 of the European Parliament and of the Council of 4 July 2017 setting a framework for energy labelling and repealing Directive 2010/30/EU – OJ 28.7.2017, p. 1.

Regulation (EU) 2015/1185), only the useful efficiency at nominal heat output is considered in the seasonal space heating energy efficiency.

Energy savings of a product in combination with control options are taken into account in a simplified way in the energy efficiency values. The energy efficiency requirements are technology specific and in some cases fuel and size dependent.

Requirements for emissions

In addition to the energy efficiency criteria, the regulation defines requirements aimed at reducing other relevant environmental impacts, including:

- NO_x emissions for fuel-based local space heaters (solid and non-solid fuels);
- PM, OGC emissions and CO emissions for solid fuel local space heaters.

For Nitrogen Oxides (NO_x) emissions the requirements are technology dependent. For gaseous and liquid fuel local space heaters, the regulation prescribes emission levels in relation to the fuel input expressed in mg NO_{2,equivalent}/kWh_{input}; for the solid fuel local space heaters the regulation prescribes emission content in flue gas expressed in mg NO_{2,equivalent}/m³.

Particulate Matter (PM) emission of the solid fuel local space heaters is expressed in mg PM/m³ or g PM/kg, depending on the selected measurement method. Requirements are technology dependent.

For Organic Gaseous Compounds (OGC) and Carbon monoxide (CO) emissions of solid fuel local space heaters, the emissions levels are expressed in mg OGC/m³ and mg CO/m³ respectively and are technology and/or fuel dependent.

The emission requirements given per m³ flue gas are valid for 13% O₂ content in the flue gas.

Requirements for product information

Information requirements are specified in the regulations. These include that portable electric local space heaters have to incorporate the following sentence in the instruction manual for end-users, free access websites of manufacturers and the product packaging: "This product is only suitable for well insulated spaces or occasional use" and flueless local space heaters have to incorporate the following sentence in the instruction manual for end-users, free access websites of manufacturers and the product packaging: "This product is not suitable for primary heating purposes".

The following table gives an overview of the requirements to be fulfilled as well as the dates on which these requirements apply.

	Energy efficiency and Product information requirements	Requirements on NO _x emissions	Requirements on PM emissions	Requirements on OGC emissions	Requirements on CO emissions
TIER I Local space heaters	01/01/2018	01/01/2018			
TIER I Solid fuel local space heaters	01/01/2022	01/01/2022	01/01/2022	01/01/2022	01/01/2022
Gaseous fuel local space heaters	X	X			
Liquid fuel local space heaters	X	X			
Electric local space heaters	X				
Solid fuel local space heaters	X	X	X	X	X
Cookers	X				

5.2. Energy labelling requirements

The local space heaters in scope of energy labelling are set out in Article 1 of Commission Regulation (EU) 2015/1186. Not all the products in scope of ecodesign are in scope of energy labelling: notably, electric local space heaters and local space heaters with a nominal heat output above 50 kW are not in the scope of energy labelling.

The energy labelling requirements will come into force:

- from 1/1/2018: for all local space heaters except flueless local space heaters using solid fuels or open to chimney local space heaters using solid fuels;
- from 1/1/2022: for flueless local space heaters using solid fuels and open to chimney local space heaters using solid fuels.

The energy labelling scale will go from A++ to G.

The energy labelling requirements apply to suppliers and dealers to ensure correct and consistent use of the label throughout the supply chain. The responsibilities of suppliers and dealers specified in Article 3 and Article 4 of the Energy Labelling Regulation (EU) 2015/1186 apply.

In addition, certain obligations of suppliers and dealers are set out in the new framework for energy labelling set out in Regulation (EU) 2017/1369 repealing Directive 2010/30/EU, which entered into force on 1 August 2017. The obligations are set out in Articles 3, 4, 5 and 6 of Regulation (EU) 2017/1369.

It is relevant to highlight here that the supplier must provide to the dealer the label and the additional information in such a way that the dealer is able to provide the necessary information to customers. The technical parameters to be communicated are defined in Annex V and Annex II of the Ecodesign Regulation for local space heaters (EU) 2015/1188 and the Ecodesign Regulation for solid fuel local space heaters (EU) 2015/1185 respectively; and Annex V of the Energy Labelling Regulation (EU) 2015/1186.

6. Measurements and calculations, the relationship between the regulations, Commission communication (2017/C 076/02) and harmonised standards

For purposes of conformity assessment and verification of compliance, measurements and calculations should be done by using harmonised standards.

If the reference numbers of the standards have not been published in the Official Journal of the European Union, the standards have not been recognised by the European Commission as providing presumption of conformity with the Regulations.

In the case of local space heaters, no harmonised standards are currently available. Hence, the regulations have to be applied in combination with Commission communication [\(2017/C 076/02\)](#)⁶, also referred to as the "transitional method".

In case the Commission communication or the standard contradict the regulation, the regulation prevails.

⁶ OJ C 76 of 10 March 2017p 4-11

7. Frequently asked questions

USE AND OBLIGATIONS REGARDING THE ENERGY LABEL

- 1. Is voluntary application of the label before the official introduction admitted? How to ensure uniform application in the EU?***

Voluntary application of the label before the official implementation date is not allowed. Delegated acts specify the date from which a particular label shall be supplied. If it is supplied and subsequently displayed before that date the label is thus used in a manner not provided for in the delegated act.

- 2. Can the energy label be displayed before application at trade fairs, where products are not sold and end-users do not have access (the fairs are only for professional intermediates, such as installers)?***

Regulation (EU) 2015/1186 specific for the energy labelling of local space heaters and the new energy labelling framework Regulation (EU) 2017/1369 establish that the dealer has to ensure that each local space heater bears the label at the point of sale. A trade fair, where products are not sold and end-users do not have access, is not a point of sale. Therefore, there is no obligation to display the label and at the same time information can be provided to professionals about the energy labelling class of the product. Even if no energy labelling legal requirements apply, common sense dictates that in order to provide accurate information, the labels displayed shall be in line with the relevant regulations.

- 3. Should the energy label be delivered together with the local space heater inside the box, or could it be provided for each local space heater by means of separate literature regarding the product, websites, brochures, evidence at sales point, etc.?***

According to Article 3 of Regulation (EU) 2015/1186 and Article 3 of the new energy labelling framework regulation (EU) 2017/1369, the label shall be printed; there is no specific indication on where to provide it, but websites cannot be used to provide an alternative to “printed” labels. It is to be understood that the dealer has to be provided with correct and clear information on the energy performance of heaters. The label may be delivered together with supplementary material as long as labels are provided with each individual local space heater.

- 4. With regard to the obligation to communicate the efficiency class, the definitions of energy related information and technical parameters are unclear: for example, are dimensions technical parameters?***

Dealers are obliged to provide information on the energy efficiency of the product together with any technical promotional material or together with information describing the technical parameters of the product. The technical parameters are laid down in Annex V of Regulation (EU) 2015/1186. Dimensions (i.e. regarding the size of the product) are not considered as technical parameters.

5. For products in scope of Regulation (EU) 2015/1186 for the energy labelling of local space heaters, is a price list of the supplier, which is used for dealers only, defined as technical promotional material?

Any visual advertisement relating to a specific product and containing price information has to include a reference to the energy efficiency class of the product and the range of efficiency classes. As price lists obviously include information on prices, they are covered by this obligation.

For price lists used in digital format, e.g. for a retailers' database, a reference to the seasonal space heating energy efficiency class under average climate conditions for that model should be included.

6. Are units delivered to dealers before 1 January 2018 subject to the energy labelling requirement?

No. Regulation (EU) 2015/1186 for the energy labelling of local space heaters is only applicable to products that are placed on the market or put into service from 1 January 2018 onwards.

7. What happens if a label has not the exact dimensions as indicated in Regulation (EU) 2015/1186?

The format and dimensions of the label as laid down in Regulation (EU) 2015/1186 have to be respected. The Member States are responsible for assessing compliance with the requirements of Regulation (EU) 2015/1186, including the label format.

8. On the energy label, the direct heat output needs to be displayed: should this be the gross calorific value or the net calorific value?

The heat output is independent of net or gross calorific value. The difference between net and gross calorific value affects the fuel input (for example energy efficiency or emission requirements).

9. How shall the Energy Efficiency Index (EEI) be rounded for determination of the energy efficiency class?

The EEI value for the determination of the energy efficiency class shall be to the nearest one decimal place.

ENTRY INTO FORCE AND IMPLEMENTATION OF THE REGULATIONS

10. Clarify if the following assumption is correct: The energy labelling requirements apply also to the appliances that have been produced/imported before the entry into force of the regulation (1/1/2018 or 1/1/2022 depending on the product), but were stored at the retailers' premises for the meantime.

No, it is not correct.

Regulation (EU) 2015/1186 with regard to the energy labelling of local space heaters set out requirements on the products at the time of their placing on the market or putting into service.

Article 3 of Regulation (EU) 2015/1186 sets out the suppliers' responsibilities and timetable for placing on the market or putting into service local space heaters.

Definition 2(7) of the new framework for energy labelling set out in Regulation (EU) 2017/1369 makes it clear that a product is placed on the market when it is supplied for distribution or use on the Union market. Section 2.3 of the Blue Book⁷ specifies that "a product is placed on the market when it is made available for the first time on the Union market."

So, when the manufacturer sells the product to the dealer, that is the key date which determines whether or not the obligation applies. If the manufacturer (or importer) first places it on the Union market and then dealer stores it in his warehouse before actually putting it on display, the legal situation is unchanged – the obligations apply, or do not apply, from that first date.

It is true that this can have the result that the same product may be required to have a label in one shop, but the same model might not have to have a label in a different shop because it was placed on the market before the date the obligation came into force. This exact situation was examined by the European Court of Justice in case C-319/13 Rätzke⁸. The European Court of Justice confirmed that:

"Article 4(a) of Commission Delegated Regulation (EU) No 1062/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of televisions must be interpreted as meaning that the obligation for dealers to ensure that each television, at the point of sale, bears the label provided by the suppliers in accordance with Article 3(1) of that regulation applies only to televisions which have been placed on the market, that is to say, dispatched for the first time by the manufacturer with a view to their distribution in the sales chain, from 30 November 2011."

A retailer cannot ask a manufacturer (or importer) for a label with respect to a product that was placed on the market before the labelling obligation was of application - there is no legal basis for the request. Although Art 5(3) of Regulation (EU) 2017/1369 requires dealers to request a label if they do not have one, it is clear from Art 3(1) of Regulation (EU) 2017/1369 that the labels are supplied in accordance with the relevant delegated act, and the delegated act sets out the time frame for its application.

11. Which time frame before the implementation date of the ecodesign requirements is tolerated for manufacturers to deliver their appliances to dealers and distributors?

⁷ Commission Notice – Blue Guide on the implementation of EU products rules (2016/C/272/01)

⁸ <https://publications.europa.eu/en/publication-detail/-/publication/03745613-bb15-11e3-86f9-01aa75ed71a1/language-en>

The regulations for ecodesign set out requirements on the products at the time of their placing on the market or putting into service.

If products are placed on the market or put into service before the application date of the ecodesign requirements, they do not have to comply with the ecodesign requirements.

For further details on the concepts of "placing on the market" and "putting into service", please see section 2.3 of the Blue Guide⁹.

12. What is the language that is to be used in the product fiche, the technical documentation and the information requirements?

The Blue Guide¹⁰ states the following:

'The manufacturer, importer and distributor have the obligation to ensure that the product is accompanied by instructions in a language which can be easily understood by consumers and other end-users, as determined by the Member State concerned. It is for each economic operator which makes available the product in a Member State, to ensure that all the required languages are available

(...)

The idea is that the national authority might accept a language they understand and which is different from the national language(s). The language chosen is subject to negotiation with the authority and could be a third language, if accepted by the authority.'

SCOPE

13. Are air curtains (also called air doors) that distribute heated air considered to be an electric local space heater in scope of Regulation (EU) 2015/1188?

No.

Air curtains can serve many purposes. They can be intended to help keep flying insects out by creating forceful turbulence or to prevent outside air entering by reducing infiltration through the opening. They can also be used to avoid cold draughts by mixing in warm air heated by the air curtain. Their function is to separate different climatic zones rather than to heat a room. The functionality of air curtains is different from local room space heaters.

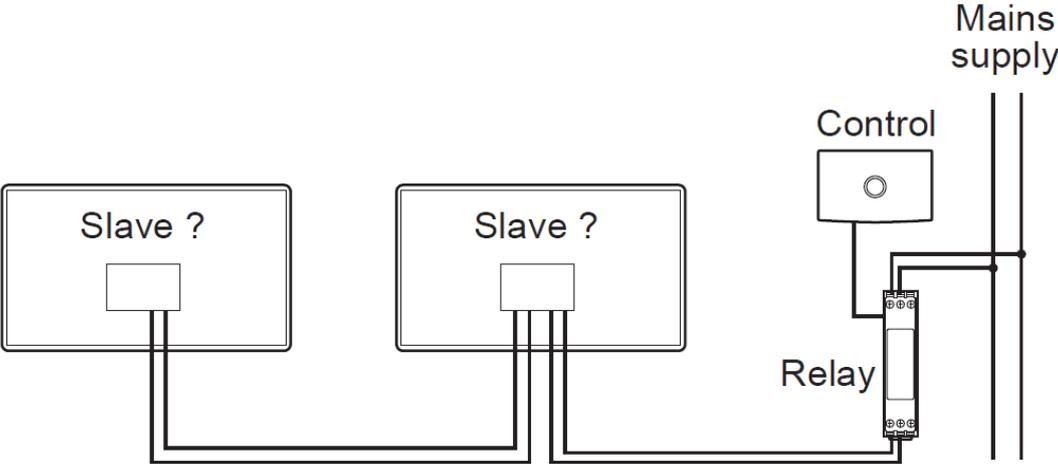
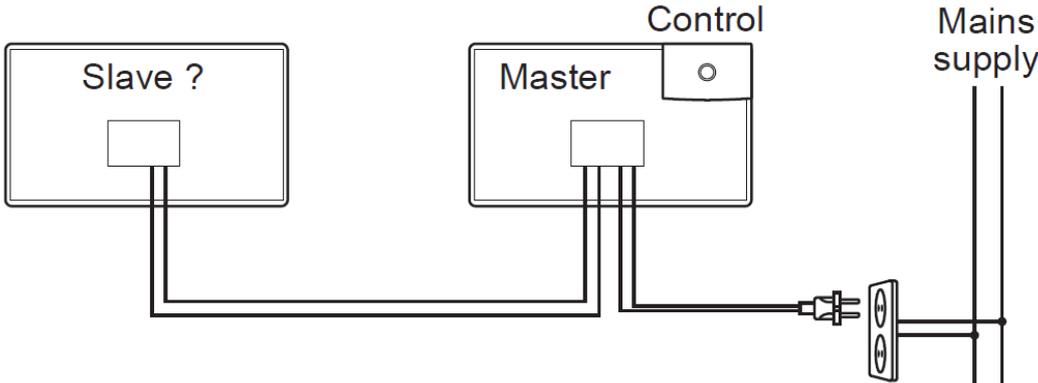
The preparatory study for local space heaters¹¹ had excluded air curtains from the scope of Regulation (EU) 2015/1188.

⁹ Commission Notice – Blue Guide on the implementation of EU products rules (2016/C/272/01)

¹⁰ Commission Notice – Blue Guide on the implementation of EU products rules (2016/C/272/01)

¹¹ Preparatory Study for Ecodesign Requirements of EuPs (III) ENER Lot 20 – Local Room Heating Products, 2012

14. Are 'slave' heaters in the following configurations considered slave heaters for Regulation (EU) 2015/1188?



Yes.

Please note that it is the responsibility of the manufacturer to assure compliance of the product with the legislation.

15. Is an electric space heater considered to be a slave heater for Regulation (EU) 2015/1188 if it consists of an electric space heater but lacks an electric plug?

The existence of an electric plug is not decisive. What is decisive is whether the product has a component that receives a signal from the master controller and that regulates the emission of heat accordingly. When a product has such a component it is considered to be a slave heater. The product cannot emit heat without that signal.

In practice, a slave heater connected to the mains power system is off until it receives a signal to turn on. That signal can, for example, be transmitted through the power line, but the existence of a power supply alone does not make the product a slave heater (see also the next Q&A).

16. What does 'not capable of autonomous operation' mean?

'Capable of autonomous operation' can be derived from the definition of a slave heater (Article 2(16) of Regulation (EU) 2015/1188): 'needs to receive signals sent from an external master controller, not being part of autonomous operation the product but connected to it by pilot wire, wireless, power line communication or an equivalent technique, in order to regulate the emission of heat into the room in which the product is installed'.

The signal to be provided is a control signal; this does not include the power connection and the option of just switching power ON and OFF. Therefore, a heater without control that will start heating when switching power ON and OFF is not a slave heater according to the definition of Regulation (EU) 2015/1188.

17. When a local space heater has two modes, one autonomous and the other non-autonomous, does it fall under the definition of a slave heater (exception in Article 1.g. of Regulation (EU) 2015/1188)?

Article 2 (19) of Regulation (EU) 2015/1188 states that a slave heater is a heater that is not capable of autonomous operation.

In case a product has two modes, one autonomous and the other non-autonomous, it is considered capable of autonomous operation and therefore it is not exempted by article 1 (g).

18. Are towel rails in the scope of Regulation (EU) 2015/1188?

If a 'towel heater' is not capable to reach and maintain a certain level of human thermal comfort within an enclosed space in it is situated, then it is not a 'local space heater' as defined by Article 2(1) of Regulation (EU) 2015/1188 and thus out of the scope of the Regulation. If it is capable of doing so, it is covered by Regulation (EU) 2015/1188, unless it is 'specified for purposes other than indoor space heating to reach and maintain a certain thermal comfort of human beings by means of heat convection or heat radiation' as specified in Article 1(b) of the Regulation. In that case the product cannot be marketed as a local space heater.

19. Are spot heaters, i.e. small fan heaters used as supplementary heating, in scope of Regulation (EU) 2015/1188?

Yes. Furthermore, they need to bear the following sentence in the instruction manual for end-users, free access websites of manufacturers and the product packaging: 'This product is only suitable for well insulated spaces or occasional use'.

20. Can controllers that only have an on/off function and nothing else still be sold after the implementation date of the ecodesign requirements of Regulation (EU) 2015/1188?

Yes. Controls do not fall under Regulation (EU) 2015/1188. The Regulation does not put any requirement on controls which are sold separately, unless they would fall under the definition of 'local space heater'.

21. Are air heating products in scope of Regulation (EU) 2016/2281 excluded from the scope of the Ecodesign Regulation (EU) 2015/1188?

Air heating products, as defined in Regulation (EU) 2015/1188 (Art.2 point 23) are excluded from the Regulation by Article 1(e). Please note that this definition is not completely identical to the definition in Regulation (EU) 2016/2281.

22. Are fan coil units or mix radiators to be considered as local space heaters under the regulations for local space heaters?

No. As long as the fan coil units and mix radiators are not equipped with one or more heat generators, they are not local space heaters as per the definition in the regulations.

Fan coil units are however in scope of Regulation (EU) 2016/2281.

23. What is the "extended period, as declared by the manufacturer" described in Article 2 points (27) and (29) of Regulation (EU) 2015/1188 for ecodesign or the "extended period, as declared by the supplier" in Article 2 point (26) of Regulation (EU) 2015/1186 for energy labelling?

This is the period during which steady state conditions are achieved.

24. Are flueless local space heaters in scope of the regulations?

Yes. Flueless heaters have to comply with the information requirements specified in Regulation (EU) 2015/1188 and Regulation (EU) 2015/1185 for ecodesign and the labelling requirements in Regulation (EU) 2015/1186.

25. Are decorative local space heaters excluded from Regulation (EU) 2015/1185, Regulation (EU) 2015/1186 and Regulation (EU) 2015/1188?

The decorative characteristics of a heater are not a criterion to determine whether the product is in the scope of the Regulations or not: the decisive element is whether the heater is capable to reach and maintain a certain level of thermal comfort within an enclosed space in which the product is situated. If it is capable of doing so, it is covered by the Regulations, independent of its decorative aspects. Please refer to Article 1(b) of

Regulation (EU) 2015/1185, Article 1(d) of Regulation (EU) 2015/1186 and Article 2(1) of Regulation (EU) 2015/1188.

26. Are solid fuel local space heaters that are built on site from components from different manufacturers in scope of Regulation (EU) 2015/1185?

No. Article 1(2)(d) of Regulation (EU) 2015/1185 exempts products that are not factory assembled or are not provided as prefabricated components or parts by a single manufacturer which are to be assembled on site.

27. Are manually restored historical stoves in scope of Regulation (EU) 2015/1186?

In case such historical stoves are not 'factory assembled' or 'if they are not provided as prefabricated components or parts by a single manufacturer which are assembled on site', they are covered by the exemption (g) in article 1 of Regulation (EU) 2015/1186.

28. Are portable car heaters considered to be electric local space heaters regulated by Regulation (EU) 2015/1188?

As stated in Whereas (3) of Regulation (EU) 2015/1188, "the Commission has carried out a preparatory study to analyse the technical, environmental and economic aspects of local space heaters typically used for heating purposes in residential and commercial buildings." A portable car heater is not meant for buildings and is therefore not included in the scope of the regulation.

But if the product is marketed as suitable to be used both in buildings and cars (or other vehicles such as caravans) it would be included in the definition of local space heaters according to Regulation (EU) 2015/1188 and would have to comply with the requirements.

29. For those local space heaters that can be operated with different types and combinations of fuels: is the compliance with ecodesign requirements needed only for the preferred fuel?

No. Ecodesign requirements need to be fulfilled with all fuels the product is marketed to be operated with.

MEASUREMENT AND CALCULATION

30. Can correction factors for electric local space heaters be claimed if the control is not provided with the appliance?

As per the definitions, the product needs to be "equipped" with the controls when placed on the market or put into service. This means that the control can be external, but it needs to be placed on the market with the product in order to claim correction factor; the packaging does not need to be the same.

The control cannot be optional; it needs to be placed on the market or put into service together with the local space heater.

31. Can an appliance equipped with an electronic room temperature control integrated in the product and sold with a connection function to a programmable external user interface through a remote connection (wire or wireless) allowing each connected product to be operated on e.g. a weekly basis (week timer), be considered as complying with the definition for “with electronic room temperature control plus week timer”?

When the electronic room temperature control of the unit is integrated in the product and when the external part is merely a user interface (e.g. app on a phone), it can be considered that the product comes within the definition of 'equipped with electronic room temperature control'. At this point, the user interface can control several products, given that the control itself is integrated in each separate product.

In case the manufacturer claims a correction factor F(2) or F(3), but the control cannot be operated as per the claimed correction factors without the user interface, the instruction manuals for installers and end-users need to clearly mention that the unit is to be installed with the user interface and need to include a description of how to install it.

The product has to be equipped with all necessary components to be able to use these function(s). Offering these components only as options to be purchased separately and installed by the customer is not sufficient for claiming the correction factors.

32. Does a product without display, but equipped with a daily programming function (e.g. heater programmed manually by choosing between settings on day one; heater automatically repeats these settings on the following days) comply with the definition 'with electronic room temperature control plus day timer'?

Yes. The definition of 'with electronic room temperature control plus day timer' in the two ecodesign regulations (Regulation (EU) 2015/1185 and Regulation (EU) 2015/1188) does not specify manually/automatic, or with/without display.

Please note that the unit should be programmable; a predefined fixed factory setting does not “allow the setting of timing and temperature” and therefore does not comply with the definition.

33. Does a product without display but equipped with two weekly “factory pre-set” programmes P1/P2 (user-selectable) comply with the definition “with electronic room temperature control plus week timer”?

No.

Annex I(20) of Regulation (EU) 2015/1188 and Annex I(18) of Regulation (EU) 2015/1185 define a product “with electronic room temperature control plus week timer” as a product which is "equipped with an electronic device, either integrated or external, that allows the product to automatically vary its heat output over a certain time period, in relation to a certain required level of indoor heating comfort, and allows the setting of timing and temperature levels for a full week. During the 7-day period the settings must allow a variation on a day-to-day basis".

A predefined fixed factory setting would not “allow the setting of timing and temperature levels”. It would also not fulfil the requirement of “the settings must allow a variation on a day-to-day basis”.

34. If a product has no standby mode, does it mean that $F4 = 0$, whatever is its power consumption?

For electric local space heaters:

$$F(4) = CC \cdot \frac{a \cdot el_{sb}}{P_{nom}} \cdot 100 \%$$

If there is no standby mode $el_{sb}=0$, and consequently $F(4)=0$.

For local space heaters using fuels:

$$F(4) = CC \cdot \frac{0,2 \cdot el_{max} + 0,8 \cdot el_{min} + 1,3 \cdot el_{sb}}{P_{nom}} \cdot 100 \%$$

If there is no standby mode $el_{sb}=0$, $F(4)$ cannot equal 0, as the auxiliary modes remain.

35. Is network standby considered by Regulations (EU) 2015/1188, (EU) 2015/1185 and (EU) 2015/1186?

Yes. When the wireless port is deactivated, it falls under the definition of standby set out in Annex I of each of the three regulations.

36. In Annex III (f) of Regulation (EU) 2015/1188, α is by default 0 if the product complies with the limit values set in Regulation (EC) No 1275/2008. What are these limit values?

In the regulation there are limit values for standby and for off mode power consumption, see Annex II of Regulation (EU) 1275/2008:

	Description	Limit values
Off mode	Power consumption of equipment in any off-mode condition	0.5 W
Standby mode	Power consumption of equipment in any condition providing only a reactivation function, or providing only a reactivation function and a mere indication of enabled reactivation function	0.5 W
	Power consumption of equipment in any condition providing only information or status display, or providing only a combination of a reactivation function and information or status display	1 W

For α to be 0, the product has to comply with both the limit values for off mode and standby mode; this can be applied to all local space heaters, not only those listed in Annex I of Regulation (EU) 1275/2008.

37. A local space heater with an electronic room temperature control will run in transitional periods of thermostat on and thermostat off. During thermostat off the appliance is still operational (Thermostat off periods are those periods when the unit is operating, but where there is no load in the building and hence the thermostat switches off). Should these “off” periods be considered as “standby”?

No. The standby mode provides one of the following functions:

- a reactivation function with or without an indicator showing that this function is enabled;
- and/or information or status display .

Any mode that provides other functions is not considered as standby mode. The definition of standby mode is the same for the three Regulations (EU) 2015/1188, (EU) 2015/1185 and (EU) 2015/1186 and can be found in Annex I of each regulation.

38. Are the correction factors to be subtracted / summed as percentage points or percent of the η_{son} value?

As percentage points.

39. Should portable appliances sold with features which can be used to fix it on a wall have to comply with ecodesign requirements applicable to fixed room heaters? Should a fixed appliance sold with a kit of castors be considered as a portable?

The classification of the local space heater is dependent on its intended use and how it is marketed (in the catalogues, leaflets, etc.).

If the product is marketed as a local space heater that can be used either as a portable or as a fixed local space heater, then it has to comply with both requirements. In practice, this means that the product has to comply with the most stringent requirements, i.e. those of the fixed local space heaters.

40. Does an electric fixed radiant local space heater have to comply with the requirements of an electric radiant local space heater or an electric fixed local space heater? If an electric radiant heater is fixed, can the factors F(3) for radiant and fixed be accumulated?

The requirements for electric radiant space heaters are applicable to all types of electric radiant space heaters independent of whether they are fixed or portable.

Cumulating F(3) factors in Annex III, Table 8 of Regulation 2015/1188 for different types of heaters is not allowed; cumulating the different control options in Table 8 is allowed. If the radiant heater has e.g. a distance control option and a room temperature control with open window detection, then the F(3) would be 1% + 1%.

41. How should the nominal heat output to the room of a slow heat release appliance be determined?

$$\text{nominal heat output [kW]} = \frac{\text{thermal output}}{t_{25}}$$

with thermal output as determined according to the EN 15250 and t_{25} as the time when 25% of the peak temperature is reached and as determined during type testing of the appliance.

INFORMATION REQUIREMENTS

42. How to manage the technical documentation and information for local space heaters that can be operated with different types and combinations of fuels (e.g. pellets + wood logs or wood logs + coal)?

Regulation (EU) 2015/1185 (in Article 2(14)) defines the concept of 'preferred fuel'. In Table 1 of Regulation (EU) 2015/1185 several types of fuels are identified, including some blended fuels. In the second column of Table 1, the manufacturer needs to select only one of the specified fuels as preferred fuel. If the local space heater can be operated with other fuels too, the manufacturer needs to select them in the third column of Table 1. Table 1 is part of the information that shall be provided according to Annex II.3.a(i) and (ii).

In Table 1, the parameters η_s , PM, OGC, CO and NO_x need to be given for all fuels the unit is marketed to be operated with; the parameters for the heat output, useful efficiency, auxiliary electricity consumption, permanent pilot flame power requirement need to be given for the preferred fuel only.

The same applies to Table 2 of Regulation (EU) 2015/1186. Regulation (EU) 2015/1186 has in Article 2(20) the same definition of 'preferred fuel' as Regulation (EU) 2015/1185.

43. Which heat output is to be indicated on the label? nominal, minimum or maximum heat output?

The heat output to be included in the energy label following the requirement in Annex III point (a)V. of Regulation (EU) 2015/1186, is the nominal heat output.