



KRAJOWA IZBA KOMINIARZY

Warszawa, dnia 02.09. 2025r.

Ref. No: MZ/ 28 /2025

Position statement of the National Chamber of Chimney Sweeps on the revision of eco-design requirements for local solid fuel space heaters, set by the EU's Commission Regulation (EU) 2015/1185.

After carefully reviewing the assumptions related to the eco-design revision and the Directorate General for Energy (DG ENER)'s presentation from June 25, 2025, we, as the Chimney Sweep Community, believe that the European Commission is heading towards the total elimination of local solid fuel space heaters from the market. This move could also lead to excluding wood from the list of acceptable fuels.

We believe that this approach lacks a foundation in technical evidence or research.

1. No evaluation of the current legislation's effectiveness has been conducted, nor has a reliable analysis of the existing ecodesign requirements.

Furthermore, such evaluations are not currently feasible, as the regulations have only been in effect since 1 October 2022 and apply exclusively to newly installed appliances. Attempting to tighten these regulations just a few years after their implementation is premature and goes against evidence-based lawmaking and practical experience.

2. Deficiencies in the documentation accompanying the proposed changes.

The proposed regulations are based on incomplete and often unverifiable data.

Missing from the documentation are:

- . sources of actual emission factors.
- . analyses and tests of appliances following the current ecodesign requirements under in-use conditions.
- . tests of components (filters, catalysts, controllers) in practice;
- . an assessment of fossil fuel reductions achieved using wood and biomass.
- . an analysis of the economic costs and benefits for households and local communities.
- . a reliable assessment of the social and public health impacts resulting from the elimination of such appliances.
- . Alignment with renewable energy policies and EU climate goals.

3. No consideration of regional conditions

The European Commission appears to overlook the fact that space heaters' functions vary depending on climate and local conditions. In northern and eastern Europe, they provide essential protection for

human life and safety in the even of a power outage. In warmer regions, they may provide the primary heating source for part of the year. In both cases, these appliances remain indispensable.

4. The need to distinguish between fossil and renewable fuels

It is a serious misclassification to include wood in the same category as coal under the label of "solid fuels." Wood is a renewable fuel, and its removal from the market would contradict EU climate policy.

5. The Polish experience

For years, Poland has kept some of the strictest regulations on wood-burning appliances, including those that meet ecodesign requirements. However, the outcomes of these regulations have been far from the intended goals, as the actual contribution of such heaters to overall emissions remains small. For many years, the chimney sweep profession has emphasised that education on proper combustion and fuel preparation is crucial. This is confirmed by the experience of Germany, Austria, and Switzerland.

6. Advantages of wood heaters

Wood-burning appliances offer several significant advantages:

- They provide an independent and reliable emergency source of heat.
- They are powered by renewable fuel.
- They are durable, safe, and easy to recycle.
- They are often operated across generations.
- They have the lowest carbon footprint among heating technologies.

We request the immediate suspension of work on the review of ecodesign for MOP for an indefinite period. As the President of the Master Chimney Sweep Association, I strongly oppose any measures to restrict the use of wood as a heating source. Wood is a renewable, locally sourced, and energy-secure fuel for our citizens. Implementing bans or imposing excessively high standards would raise the cost of living, worsen fuel poverty, and undermine household energy resilience.

Operating local heaters that meet ecodesign requirements and are fuelled with locally available biofuels represents a genuine opportunity to decarbonise while simultaneously providing the security and energy independence of Europe's citizens.

Finally, I leave the question open: will the authors of the ecodesign revision take responsibility for the lives and health of citizens deprived of access to wood and independent heating sources?

President

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