

EBA - Feedback on Draft Act for Energy Efficiency – Ecodesign Requirements for Space and Combination Heaters (review)

The European Biogas Association (EBA) welcomes the draft regulation setting **Ecodesign requirements for space heaters, combination heaters, temperature controls, solar devices, shower water heat recovery devices and packages of those products.**

With the Commission's focus on a competitive and resilient transition, Europe has the potential to lower its dependency on fossil fuels while striving for the Union's goal to increase energy security and affordability. Appliance efficiency is an important part of the solution, together with building insulation, renewable energy use and demand flexibility. Electricity demand flexibility is essential to cost-effectively use renewable electricity when availability and infrastructures are not congested. However, shifting heat demand only towards electricity is not always feasible nor cost effective. Biomethane is a **renewable natural gas** that offers a readily available, complementary and decarbonised solution for Europe's heating appliances, fully adaptable to existing gas infrastructure and storage facilities. Its compatibility with current gas systems reduces upfront costs for buildings and allows for a rapid and seamless transition to net-zero energy technologies.

Looking at the Commission's proposed measures in the draft regulation, EBA would like to highlight the following elements:

- We welcome the overall objective of improving energy efficiency of heating appliances in buildings. It is nonetheless important not to ban heating appliances in the draft, and to **recognise the use of biomethane-fuelled boilers**, which are key to diversify the natural gas supply and accelerate the development of renewable fuels. That said, the current minimal seasonal space-heating efficiency included in Annex II, Table 1, are not applicable to certain boiler types, which would de facto ban certain appliances from operating on the market. Hence, we ask the Commission to reverse the minimal seasonal space-heating efficiency values for fuel boilers >70kW, with a new value of 95% for low-temperature boilers (η_1) and a new value of 87% for high-temperature boilers (η_4). Additionally, in the same Annex, the draft regulation applies the V40 requirement to all combination boilers. This would however exclude instantaneous and micro-accumulated hot water boilers, including those fuelled by biomethane, because the V40 test method is designed for storage water heaters and is hence incompatible with their operating principle rather than their actual efficiency. We therefore ask the Commission to revise the applicability of the V40 requirement to only suitable hot water boilers with storage capacity.
- We support the Commission's recognition of **hybrid heat pumps**, but we call on the Commission to recognise these systems as highly efficient and flexible solutions that are up to 25% cheaper than stand-alone electric heat pumps and can deliver immediate efficiency gains before building renovations are completed¹. In addition, biomethane can be highly effective when used in high-efficiency co-generation plants, producing renewable heat and electricity that can feed the demand when there is not enough renewable electricity to meet the demand.
- Looking at the regulation's focus on appliance energy efficiency, the Commission should display key information to consumers. First, it is important to display clear information on the variability of efficiency of electricity solutions based on how the electricity is sourced (e.g.: higher efficiency when using directly renewable electricity, including biomethane, and lower efficiency when using fossil-based

¹ EBA (2023) Beyond Biogases: Energy system integration and heating

electricity). Second, the Commission should display clear information on the demand flexibility capacity of the appliance and its ability to benefit from variable electricity prices and grid congestion tariffs without reducing user comfort, for example through hybrid heat pumps and biomethane-fuelled cogeneration systems.

Overall, maintaining a **technology-neutral approach** for heating appliances, without excluding specific appliances, ensures that renewable gases like biomethane can complement electrification, enabling a flexible, cost-effective, and a consumer-focused pathway to decarbonisation.

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About the European Biogas Association (EBA)

EBA fully believes in the future potential of renewable gas in Europe. Founded in 2009, the association is committed to the deployment of sustainable biogas and biomethane production and use throughout the continent. EBA counts today on a well-established network of over 300 national associations and other organisations covering the whole biogas and biomethane value chain across Europe and beyond.