



Build Europe
Rue de la Violette 43
1000 Brussels
Belgium

Subject: The need of balanced Ecodesign requirements for space heaters

Brussels, 11 October 2023

Dear Commissioner Simson,

Representing over 60% of the EU's homebuilding capacity and 17 States, Build Europe serves as the voice for European developers and homebuilders. We wish to address the recent working document on Ecodesign requirements concerning space heaters. While this has not received the Commission's formal endorsement, it emerged from discussions at the Ecodesign Consultation Forum on 27 April 2023.

We, together with our Members, are in favor of the Commission's shift towards the broader adoption of heat pumps and the goal articulated in your August communication to the European Parliament to enhance energy efficiency standards for space heaters. However, **we hold significant concerns**. Our primary apprehension arises from the DG ENER's draft published in May, which **hints at a 115% minimum seasonal heating energy efficiency η_s** , as outlined in Annex II, articles (a) and (c). **Build Europe firmly opposes this proposal. Setting the efficiency threshold at 115% would not promote technological diversity, but would favour almost exclusively one specific technology, namely heat pumps.**

Build Europe and its Members are actively pursuing climate goals. While, as housing professionals, **we recognise the value of heat pumps**, they should not be considered by the



European Commission as the only acceptable technology and **they should not be the only focus of EU legislation**. There are other effective heating solutions like biomass, biogas, wood pellets, solar hybrid boilers, and micro-CHP. By setting an efficiency standard at 115%, **the EU risks limiting or even eliminating the use of these valuable alternatives**, which would be detrimental to our diverse approach to achieving climate objectives.

Meeting our climate goals requires a drastic transformation of the European economy. To make this happen, our industries and citizens need the innovative potential that a free market can offer. **It's impossible to accurately predict which will be the top eco-friendly heating technology a decade from now, and legislation shouldn't favor just one option given the uncertainty**. Yet, the draft from DG Energy seems to exclusively consider (and consequently favour) heat pumps. For this reason, **Build Europe strongly urges the European Commission to reconsider this legislative approach**.

We acknowledge your assurances to the European Parliament about possible exemptions for challenging installation scenarios. Nonetheless, we trust that you'll consider our perspective on maintaining a balanced approach to the Ecodesign requirements for space heaters.

We trust you will understand our stance on this issue.

Kind regards,

Andreas Ibel
President, Build Europe

Filiep Loosveldt
Managing Director, Build Europe