

10 March 2016

## Vote against the approval of FprEN 16510-1 on “Residential solid fuel burning appliances”

In search for:

- (a) A measurement method that is as representative as possible of the emissions under real-life operation from residential solid fuel burning appliances;
- (b) A measurement method that is compatible with and appropriate to support Regulation (EU) 2015/1185 for solid fuel local space heaters,

we recommend a **negative vote** to the current standard FprEN 16510-1 proposed and the immediate start of discussions for a revised version that include all measurements needed for Regulation (EU) 2015/1185

Regulation (EU) 2015/1185 with regard to Ecodesign requirements for solid fuel local space heaters acknowledges that:

*The environmental aspects of solid fuel local space heaters that have been identified as significant for the purposes of this Regulation are energy consumption and emissions of particulate matter (dust), organic gaseous compounds, carbon monoxide and nitrogen oxides in the use phase.*

, and proceeds with setting specific Ecodesign requirements for PM emissions.

Although the work that has been undertaken for the development of current FprEN 16510 series is respected and acknowledged, we believe that, in the light of the recently-published Ecodesign requirements, the communication with the European Commission and the draft standardisation request, the current standard is not appropriate, even in the short-term, for the purpose of supporting Regulation (EU) 2015/1185.

The current standard fails to address two of the three proposed methods and modalities for measurements of particulate matter in the regulation and in the related draft standardisation request. The proposed standard only includes one of the three measuring methods plus a method that is not to be used for Regulation (EU) 2015/1185.

For that purpose, and in order to avoid unnecessary confusion and proceed in a timely manner, we urge that the standardisation bodies proceed imminently with the development of a short-term solution that is compatible with the Regulation (EU) 2015/1185, and builds on, but also improves aspects from the current methodologies. Such improved method would also better showcase the best available options for a long-term solution of a **single measurement method for emissions of particulate matter, carbon monoxide, organic gaseous compounds and nitrogen oxides, at conditions closer to real life operation of the appliances**. Therefore, in parallel, we welcome the discussions that are commencing in CEN/TC 295 for the

development of a *single measurement method for emissions of particulate matter, carbon monoxide, organic gaseous compounds and nitrogen oxides and urges that this future standard shall include conditions for measurements as close to real life operation of the appliances as practical possible.*

We look forward to your consideration of our recommendation and to the constructive discussions ahead for the proper implementation of the Ecodesign regulation.

**Contact**

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