

## Public consultation EN26 and EN89

Common AEGPL and EHI position on PR NF EN 26/A1 and on PR NF EN 89/A1: Negative vote with comments

Paragraphs concerned:

- **PR NF EN 26/A1**: Amendment of 6.9.3.1. point 241
- **PR NF EN 89/A1**: Amendment of 6.18.1. point 190

[Amendment of 6.18.1. (**PR NF EN 89/A1**) ]

### Comments:

Proposal: discard this proposal for amendment of the point § 6.18.1 and keep the original text in order to maintain, for NOx emissions from appliances running on LPG, the normative standard factors of 1.2 and 1.3 compared with natural gas.

The proposed amendment to the measurement method for NOx emissions can indeed have an unjustified negative impact on the LPG appliances' market because:

- The factors 1.2 and 1.3 for propane and butane have been used for many years in all the relevant standards<sup>1</sup> in order to take into account the physical characteristics of LPG. The higher energy density of LPG results in a higher combustion temperature which itself result in a higher disposition of the thermic formation mechanism compared to natural gas. Based on results provided by manufacturers on a small set of appliances, it appears that the gap in NOx emissions between natural gas and LPG when used in heating equipment can actually be significantly wider than the normative standard factors (up to 2.2 times more). A series of emission measurement tests will be performed in France in the coming months by the research center CETIAT, as recently commissioned by the French heating appliance association UNICLIMA with the financial support of the French LPG association. Given the high stakes and the lack of extensive data on the actual NOx emissions of appliances when running on LPG, we do not understand the justification for removing the factors from the calculation methods, considering that no impact assessment has been carried out. We ask that if the factors are modified, a technical study is carried out beforehand, in order to justify the appropriateness of this decision.
- This decision could exclude LPG appliances from the European market because it does not take into account the characteristics of this fuel (while this is the case for other fuels in the scope of the ErP Directive 2009/125/CE, which, for instance, foresees a different NOx emission ceiling for heating oil – 120 mg/kWh). Commission Regulation 814/2013 applies the same requirements on “gaseous fuels”, without making any difference between natural gas and LPG, even if these two energies have different NOx emission profiles. Hence, the use of coefficients 1.2 and 1.3 is justified, in order to take into account the specificities of these gaseous fuels. Eliminating the coefficients would mean that manufacturers will have to further decrease the NOx emissions of

<sup>1</sup> Such as CEN/TC 48, 109, 131, CEN/Cenelec JWG Fuel cells ....

their appliances respectively by 30% for butane and 20% for propane, compared with natural gas. This will create very serious issues as almost all gas heating appliances available on the European market are specifically designed for natural gas, and then only slightly modified to run on LPG.

- This decision would be in contradiction with the EC recommendations contained in the explanatory memorandum to the Commission Regulation 814/2013, which specifies that *“measures on energy efficiency and NOx emissions concerning the putting into the market of heating appliances are harmonized in the EU, in a way that minimizes costs and administrative fees for economic operators”*. Removing the coefficient would result in a significantly higher burden on LPG appliances than on appliances running on other energy sources.
  - This proposed amendment would increase the number of tests to be performed on appliances falling in two or three categories (natural gas, butane and propane), which would increase the cost of the systems and impact consumers.
  - LPG is used in areas not served by the natural gas grid, hence it is hardly replaceable by other fuels. Pushing LPG appliances out of the market would benefit other fuels, which either are more expensive (electricity), or have a much higher environmental impact, such as heating oil (in terms of CO<sub>2</sub>) or biomass (in terms of particulate matter). Hence, this amendment would negatively impact both consumers and the environment, which would be against Article 15 (*“implementing measures”*) of Directive 2009/125/CE, stating that *“there shall be no significant negative impact on consumers in particular as regards the affordability and the life-cycle cost of the product”*
- ➔ **Hence, it is fundamental that, since the peculiarities of butane and propane vs. natural gas are not taken into account in Regulations 813/2013 and 814/2013, normative standards factors are maintained in all relevant European standards setting the measurement methodology.**
- ➔ **We therefore request that these coefficients for LPG appliances’ NOx emissions are maintained in the EN standards related to the implementation of Ecodesign legislation.**

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