

Solid Fuel Boilers

Ecodesign and Energy Labelling Guidance Note

November 2020

Introduction

This guidance note is intended to assist suppliers (i.e. manufacturers, importers or authorised representatives¹) of solid fuel boilers in meeting their obligations relating to ecodesign and energy labelling.

It provides a general overview of the current ecodesign and energy labelling requirements for solid fuel boilers and guidance on the measurements and calculations that should be applied in determining the values displayed on the product energy label, the product information sheet, and as required in the technical documentation demonstrating the compliance of the product with the energy labelling and ecodesign requirements.

The relevant legislation

The requirements for ecodesign and energy labelling for products being placed on the market are set out in the following European regulations and discussed further in the following sections.

- Regulation (EU) 2015/1187 with regard to energy labelling of solid fuel boilers and packages of a solid fuel boiler, supplementary heaters, temperature controls and solar devices (in force since 2017 and applicable to products with a nominal heat output of less than or equal to 70 kW) these regulations can be found here: https://eurlex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02015R1187-20170307&from=EN
- Regulation (EU) 2015/1189 with regard to the ecodesign requirements for solid fuel boilers (in force since January 2020 and applicable to products with a nominal heat output of less than or equal to 500 kW) – these regulations can be found here: <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02015R1189-</u> 20170109&from=EN

It is important for suppliers to be familiar with these regulations, to ensure that products you place on the market are compliant with the regulations.

DISCLAIMER

SEAI has developed this guidance to help relevant entities understand and fulfil their obligations under the ecodesign and energy labelling regulations. The specific requirements for ecodesign and energy labelling are contained in the above-mentioned delegated acts and this guidance document should not be used as a sole resource for demonstrating compliance. It is the individual supplier's responsibility to ensure compliance with the relevant regulatory requirements.

¹ further described in Appendix 1.



ENERGY LABELLING

Regulation (EU) 2015/1187 requires that suppliers of solid fuel boilers with a nominal heat output of \leq **70 kW** provide the following product information.

Energy Label

A copy of the energy label in accordance with Section 1 of Annex III of Regulation (EU) 2015/1187 must be provided. The format of the energy label depends on the configuration of the product in question – as supplied by the supplier and after any applicable date.

Some of the current formats for solid fuel boilers and solid fuel boiler packages² are shown in the examples provided below – refer to Annex III of the regulation to confirm which format applies to your specific models.

Solid fuel boiler label

Solid fuel boiler package label



The energy label must be provided with each unit sold. In addition, suppliers must also make an electronic version of the label available to retailers.

A copy of the energy label should also be provided to the market surveillance authority (MSA) when requested.

² a package offered to the end-user containing a solid fuel boiler combined with one or more supplementary heaters, one or more temperature controls or one or more solar devices – therefore a boiler with a temperature control device, for example, is considered a package.



Product Information Sheet

Suppliers must provide a copy of the product information sheet (also referred to as the 'product fiche') with each unit sold, in accordance with Section 1 of Annex IV of Regulation (EU) 2015/1187 and which must contain the information below, in the following order.

- a) supplier's name or trademark
- b) supplier's model identifier
- c) the energy efficiency class of the model
- d) the rated heat output (X,X kW)
- e) the energy efficiency index
- f) the seasonal space heating energy efficiency in (X%)
- g) any specific precautions that shall be taken when the solid fuel boiler is assembled, installed or maintained
- h) in the case of solid fuel cogeneration boilers, the electrical efficiency (%)

The product information sheet must be provided in the product brochure or other product literature. One product information sheet may cover a number of boilers marketed by the same supplier. An example product information sheet is shown below.

Product Information Sheet (Fiche) – Solid fuel boiler

Product Information Sheet

Delegated Regulation (EU) 2015/1187 Supplier 1234 Supplier name or trademark Model identifier Solid Fuel Boiler 1234 Energy Efficiency Class A+ Rated heat output 5 kW Energy Efficiency Index 110 Seasonal space heating energy efficiency 97 % Specific precautions List any specific precautions to be taken when the appliance is assembled, installed or maintained.

In addition, for packages of solid fuel boilers, supplementary heaters, temperature controls and/or solar devices, a product information sheet providing the information listed in Section 2 of Annex IV of Regulation (EU) 2015/1187, is to be provided by the supplier with each package. This information must include the supplementary data as shown in the following figure.

A product information sheet must be provided with each boiler unit or package that is sold. In addition, suppliers must also make an electronic version of the product information sheet available to retailers.

A copy of the product information sheet should also be provided to the Market Surveillance Authority (MSA) when requested.



Product Information Sheet (Fiche) – supplementary information to be provided for packages of a solid fuel boiler, supplementary heater, temperature and/or solar devices



The energy efficiency of the package of products provided for in this fiche may not correspond to its actual energy efficiency once installed in a building, as this efficiency is influenced by further factors such as heat loss in the distribution system and the dimensioning of the products in relation to building size and characteristics.



Technical Documentation

Suppliers of solid fuel boilers must prepare specific technical documentation in accordance with Section 1 of Annex V of Regulation (EU) 2015/1187. This includes the specific information outlined in the Table 4 of Annex V, to be provided in the tabular format specified – Table 4 is shown in Appendix 2.

For packages of solid fuel boilers, supplementary heaters, temperature controls and/or solar devices, the specific technical documentation requirements are outlined in Section 2 of Annex V. Such technical documentation should be accompanied by evidence supporting the information presented in Table 4, such as test reports, calculations etc.

EPREL

The European Product Database for Energy Labelling (EPREL) has been set up under EU Regulation 2017/1369 to provide important energy efficiency information to consumers and to facilitate market surveillance activities and enforcement. Note that, while there is no direct reference to EPREL in Regulation (EU) 2015/1187, it is now a legal requirement for suppliers of products covered by the EU Energy Labelling Regulation and placed on the market since August 2017, to upload information about their products onto the database before placing these products on the market in the EU.

EPREL also has a useful feature allowing the supplier to generate a product energy label and product information sheet once the product information has been populated in the EPREL database. SEAI has prepared a guidance document that provides some further information in relation to EPREL which can be found at the following link: https://www.seai.ie/publications/EPREL-Supplier-Guidance_Final-5.pdf

Other Energy Labelling Requirements

There are a number of further requirements that also apply to suppliers of solid fuel boilers and/or packages of solid fuel boilers, supplementary heaters, temperature controls and/or solar devices:

- any visual advertisement or technical promotional material relating to a specific model or package (which may be, for example, online or in hard copy) must make reference to the energy efficiency class and the applicable range of energy efficiency classes
- if a supplier also offers solid fuel boilers or packages for sale either online or in a physical sales outlet (therefore also acting as a retailer), then the specific energy labelling requirements as per Annex VII of Regulation (EU) 2015/1187 must be followed.

More detailed descriptions of supplier obligations are outlined in Articles 3, 4 and 6 of the Energy Labelling Regulation (EU) 2017/1369³.

³ available here: <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R1369&from=EN</u>



ECODESIGN

Regulation (EU) 2015/1189 requires suppliers of solid fuel boilers with a nominal heat output of \leq **500 kW** to ensure the products they supply meet minimum ecodesign requirements in terms of seasonal space heating efficiency (η_s) and emissions (PM, OGC, CO, NOx), and requires suppliers to provide specific ecodesign product information. The minimum ecodesign requirements are outlined in Annex II of Regulation (EU) 2015/1189.

The ecodesign requirements, while related to those of energy labelling in terms of energy efficiency performance, are separate and distinct aspects that must be addressed by manufacturers.

In ensuring that products are compliant, suppliers must undertake a conformity assessment process to demonstrate that the specific ecodesign requirements have been fulfilled.

When this process is complete, suppliers⁴ must prepare a Declaration of Conformity (DoC), in accordance with Article 5 and Annex VI of the Ecodesign Directive 2009/125/EC and then affix the CE mark to the product.

Technical Documentation

When requested by a market surveillance authority (MSA), suppliers should provide the following documentation, related to the conformity assessment process, to demonstrate product compliance:

- the Declaration of Conformity
- the information required by Section 2 (c) of Annex II of Regulation (EU) 2015/1189, including the Table 1 information as shown in Appendix 2 note that this information can be combined with the information required in Table 4 relating to energy labelling, outlined previously
- evidence supporting the information presented in Table 1 such as test reports, calculations, etc.
- evidence of the information required by Section 2 (a) and (b) of Annex II of Regulation (EU) 2015/1189 being presented on free access websites and in instruction manuals.

Note also that it is a requirement that suppliers retain all documentation related to the conformity assessment process of a product so that it is available for inspection by an MSA for a period of 10 years after it was last placed on the market.

⁴ Note that <u>importers</u> do not need to undertake the conformity assessment process or prepare a Declaration of Conformity – rather they need to be able to provide a copy of the Declaration of Conformity prepared by the manufacturing company and the relevant conformity assessment documentation.



Measurements and Calculations for Ecodesign and Energy Labelling

The parameters laid down in both Regulation (EU) 2015/1187 and Regulation (EU) 2015/1189 and their means of calculation are similar, given that they are interrelated.

Regulation (EU) 2015/1187 requires the determination of the energy efficiency index (EEI), in order to identify the relevant energy efficiency class, which is informed by the seasonal space heating efficiency.

Regulation (EU) 2015/1189 requires the determination of the seasonal space heating efficiency, while also requiring the determination of the seasonal space heating emissions.

Methodologies related to the calculation of these parameters are outlined in the 'Measurements and Calculation' annexes of both regulations, as summarised in the following:

The **<u>energy efficiency index</u>** (EEI) is calculated as:

$$EEI = \eta son \times 100 \times BLF - F(1) - F(2) \times 100 + F(3) \times 100$$

The **<u>seasonal space heating energy efficiency</u>** (η_s) is calculated as:

$$\eta_s = \eta_{son} - F(1) - F(2) + F(3)$$

where (in both calculations):

 η_{son} is the seasonal space heating energy efficiency in active mode (%), calculated as set out in each regulation

F(1) accounts for a negative contribution due to adjusted contributions of temperature controls: F(1) = 3%

F(2) accounts for a contribution by auxiliary electricity consumption, calculated as set out in each regulation

F(3) accounts for a contribution by the electrical efficiency of solid fuel cogeneration boilers, calculated as set out in each regulation



Seasonal space heating emissions (Es) are calculated as:

$$Es = 0.85 \times Es, p + 0.15 \times Es, n$$

(for manually stoked solid fuel boilers that can be operated at 50 % of the rated heat output in continuous mode, and for automatically stoked solid fuel boiler)

or

Es = Es, n

(for manually stoked solid fuel boilers that cannot be operated at 50 % or less of the rated heat output in continuous mode, and for solid fuel cogeneration boilers)

where:

Es,p are the emissions of respectively particulate matter, organic gaseous compounds, carbon monoxide and nitrogen oxides, measured at 30 % or 50 % of the rated heat output, as applicable

Es,n are the emissions of respectively particulate matter, organic gaseous compounds, carbon monoxide and nitrogen oxides, measured at the rated heat output

Energy Efficiency Classes

The energy efficiency classes for a given EEI are specified in Table 1, Annex II of Regulation (EU) 2015/1187 and shown in the following.

Energy Efficiency classes of solid fuel boilers

Table 1						
Energy efficiency classes of solid fuel boilers						
Energy efficiency class	Energy efficiency index (EEI)					
A+++	$EEI \ge 150$					
A++ -	125 ≤ <i>EEI</i> < 150					
A^+	98 ≤ <i>EEI</i> < 125					
А	$90 \le EEI < 98$					
В	82 ≤ <i>EEI</i> < 90					
С	75 ≤ EEI < 82					
D	36 ≤ EEI < 75					
E	34 ≤ <i>EEI</i> < 36					
F	$30 \leq EEI < 34$					
G	EEI < 30					



Standards

The following standards/test methods are identified by the European Commission for use in determining the parameters outlined above, as per Commission Communication 2017/C 076/01 and are available here⁵:

Parameter	Reference/title	Notes
General	EN303-5:2012 Heating boilers	Condensing boilers are to be
conditions for	for solid fuels, manually and	tested in condensing mode.
testing	automatically stoked, nominal	
	heat output of up to 500 kW	The applicable part load (30 % or
	— Terminology, requirements	50 %) is to be used instead of the
	and marking, 5.7 Conducting	minimum heat output.
	the boiler performance test	
Useful efficiency	EN303-5:2012, 3.15 boiler	Corresponds to $\eta \kappa$ measured at
at rated heat	efficiency, 5.10.3.1 Direct	rated heat output Pr , but with Q
output ηn	method	and <i>QB</i> expressed in gross calorific
		value.
Useful efficiency	EN303-5:2012, 3.15, 5.10.3.1	Corresponds to $\eta_{\mathcal{K}}$ measured at
at applicable part		applicable part load (30 % or 50
load η_P		%), but with Q and Q_B expressed in
		gross calorific value.
Useful heat	EN303-5:2012, 3.6 heat output	Corresponds to heat output Q
output at rated		measured at rated heat output Pr,
heat output Pn		but expressed in gross calorific
		value.
Useful heat	EN303-5:2012, 3.6	Corresponds heat output Q
output at		measured at applicable part load
applicable part		(30 % or 50 %), but expressed in
load Pp		gross calorific value.
Rated heat	EN303-5:2012, 3.7 nominal	Corresponds to nominal heat
output Pr	heat output, 5.8.2 Determining	output Q_N (when measured with
	the nominal heat output	the preferred fuel), but expressed
		in gross calorific value.
Electrical power	EN303-5:2012, 5.8.5 Electrical	Corresponds to Paux 100 in clause
requirement at	consumption	3.4.1 of EN15456:2008, but any
maximum heat		electricity consumption from a
output <i>elmax</i>	EN15456:2008, Heating boilers	back-up heater and from
	— Electrical power	incorporated secondary emission
	consumption for heat	abatement equipment is not taken
	generators — System	into account.
	boundaries — Measurements	

Commission Communication 2017/C 076/01

⁵ <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017XC0310(03)&from=EN</u>



Electrical power	EN303-5:2012, 5.8.5	Corresponds to <i>Paux</i> , g in clause
minimum heat output <i>elmin</i>	EN15456:2008	applicable part load operation (30 % or 50 %), but any electricity consumption from a back-up heater and from incorporated secondary emission abatement equipment is not taken into account.
Standby mode power	EN303-5:2012, 5.8.5	Corresponds to <i>Paux sb</i> , but any electricity consumption from
consumption PsB	EN15456:2008	incorporated secondary emission abatement equipment is not taken into account.
Gross calorific value moisture free <i>GCV_{mf}</i>	EN 14918:2009 Solid biofuels — Determination of calorific value, 10.4 Expression of results	Corresponds to $q_{V_r gr_r d}$
Moisture content of the fuel <i>M</i>	EN 14918:2009, 10.4	Corresponds to <i>Mar</i> , but expressed as fraction instead of as percentage
Characteristics for [fuel type]	EN303-5:2012, Table 7 — test fuels, water content and ash content for [fuel type]	Refer to 'Notes' for blended fossil fuel/biomass briquettes

Technical documentation (such as laboratory test reports) provided to the MSA to demonstrate the energy labelling and ecodesign compliance of a relevant product, should be conducted in accordance with the above standards.



Appendix 1:

Definition of a supplier

A 'supplier' is defined as "a manufacturer established in the Union, the authorised representative of a manufacturer who is not established in the Union, or an importer, who places a product on the Union market".

These entities are further defined as follows:

A 'manufacturer' is "a natural or legal person who manufactures a product or has a product designed or manufactured and markets that product under its name or trademark".

An 'importer' is "a natural or legal person established in the Union who places a product from a third country on the EU market".

An 'authorised representative' is "a natural or legal person established in the Union who has received a written mandate from the manufacturer to act on its behalf in relation to specified tasks".



Appendix 2:

Energy Labelling -'Table 4' Technical parameters for solid fuel boilers and solid fuel cogeneration boilers

Table 4

									2		
Model identifier				22.4	N						
Stoking mode: [Manual: tl tre/Automatic: it is recom x (**) litre]	he boiler s mended th	hould be o hat the boi	operated w ler be ope	vith a rated	hot water storage tank of with a hot water storage	a vol tank c	ume of a v	of at least olume of a	x (*) li- it least		
Condensing boiler: [yes/n	o]										
Solid fuel cogeneration be	oiler: [yes/r	10]		Con	nbination boiler: [yes/no]						
1	Fuel			1	Preferred fuel (only one)	:	Other suitable fuel(s):				
Log wood, moisture conte	Log wood, moisture content ≤ 25 %				[yes/no]			[yes/no]			
Chipped wood, moisture	content 15	-35 %			[yes/no]			[yes/no]			
Chipped wood, moisture	content >	35 %			[yes/no]	[yes/no]					
Compressed wood in the	form of pe	ellets or br	iquettes		[yes/no]	[yes/no]					
Sawdust, moisture content ≤ 50 %					[yes/no]	[yes/no]					
Other woody biomass				[yes/no]				[yes/no]			
Non-woody biomass					[yes/no]			[yes/no]			
Bituminous coal					[yes/no]			[yes/no]			
Brown coal (including bri	quettes)				[yes/no]			[yes/no]			
Coke					[yes/no]	[yes/no]			0]		
Anthracite					[yes/no]			[yes/no]			
Blended fossil fuel brique	ttes				[yes/no]	[yes/no]					
Other fossil fuel					[yes/no]	[yes/no]					
Blended biomass (30-70 %) and fossil fuel briquettes					[yes/no]	[yes/no]					
Other blend of biomass and fossil fuel					[yes/no]	[yes/no]					
Characteristics when op	perating w	vith the p	referred	fuel:							
Seasonal space heating en	ergy effici	ency η, [%]:								
Energy efficiency index El	EI:										
Item	Symbol	Value	Unit		Item	Sym	bol	Value	Unit		
Useful heat output					Useful efficiency						
At rated heat output	P _x (***)	x,x	kW		At rated heat output	η		x,x	%		
At [30 %/50 %] of rated heat output, if appli- cable	P_p	[x,x/ N.A.]	kW		At [30 %/50 %] of rated heat output, if applicable	η	р	[x,x/ N.A.]	%		
					Auxiliary electricity consur			nption			
For solid fuel cogeneration boilers: Electrical efficiency			At rated heat output	elman		x,xxx	kW				
					At [30 %/50 %] of rated heat output, if applicable	el,	eix.	[x,xxx/ N.A.]	kW		
At rated heat output	η_{cln}	x.x	%		Of incorporated secondary en sion abatement equipment, if applicable			[x,xxx/ N.A.]	kW		
					In standby mode	P,	ss	x,xxx	kW		
Contact details	Name an	d address	of the sup	pplier							



'Table 1' Information for solid fuel boilers

Table 1

Information requirements for solid fuel boilers

Model identifier(s)

Stoking mode: [Manual: the boiler should be operated with a hot water storage tank of a volume of at least x (*) litre/Automatic: it is recommended that the boiler be operated with a hot water storage tank of a volume of at least x (*) litre]

Condensing boiler: [yes/no]

Solid fuel cogeneration boiler: [yes/no]					Combination boiler: [yes/no]						
Fuel			Preferred fuel {only one}:			η. [x%]:	Seasonal space heating emissions (****)				
					Other suit- able fuel(s):		PM	OGC	CO	NO _x	
								[x] m	g/m³		
Log wood, moisture content ≤ 25 %			[yes/no]		[yes/no]			8			
Chipped wood, moisture content 15	-35 %		[yes/no]		[yes/no]			2			
Chipped wood, moisture content >	35 %		[yes/no]		[yes/no]						
Compressed wood in the form of	pellets or b	riquettes	[yes/no]		[yes/no]						
Sawdust, moisture content ≤ 50 %			[yes/no]		[yes/no]						
Other woody biomass			[yes/no]	[yes/no]						
Non-woody biomass			[yes/no]	[yes/no]			2			
Bituminous coal			[yes/no	l	[yes/no]						
Brown coal (including briquettes)			[yes/no]	[yes/no]						
Coke			[yes/no]		[yes/no]						
Anthracite			[yes/no]		[yes/no]						
Blended fossil fuel briquettes			[yes/no]		[yes/no]						
Other fossil fuel		ŝ	[yes/no]		[yes/no]						
Blended biomass (30-70 %)/fossil fuel briquettes			[yes/no]		[yes/no]			24			
Other blend of biomass and fossil fu	ıel		[yes/no]		[yes/no]						
Characteristics when operating w	ith the pre	ferred fu	el only:								
ltem	Symbol	Value	Unit		Iten	1	Symbol	v	alue	Unit	
Useful heat output					Useful efficienc						
At rated heat output	$P_{s}\left(^{***}\right)$	x,x	kW		At rated heat o	utput	η,	3	x,x	%	
4 [20 0/[50 0/] - f] h	P	[(N] 4	1 1.11		A. [20 0//50 /	0/1 - C 1		6			
At [30 %/50 %] of rated heat out- put, if applicable	P _p	[X,X/N.P	A.J KW		heat output, if applicable		η_p	N	.A.]	%	
For solid fuel cogeneration boilers: Electrical efficiency					Auxiliary electricity consumption					1	
At rated heat output		x,x	%		At rated heat output el		el _{max}	x,	xxx	kW	
	$\eta_{d,n}$				heat output, if a	ei _{min}	IX, N	.A.]	ĸw		
					Of incorporate abatement equi	ed secondary pment, if app	emission licable	n [x, N	.A.]	kW	
					In standby mod	le	P_{SB}	x,	XXX	kW	
Contact details		Name a	nd address	of th	ne manufacturer	or its author	ised repres	sentativ	re.		