



stowarzyszenie  
kominy polskie

www.kominypolskie.com.pl

Adres siedziby:  
Stowarzyszenie „Kominy Polskie”  
ul. Wschodnia 24  
45-449 Opole

NIP: 547-18-83-272

REGON: 072301122

Konto Bankowe: Bank Milenium SA o/Pszczyna 03 1160 2202 0000 0000 6808 4274

Opole, 2025-08-28

**European Commission**  
**Directorate General for Energy (ENER)**  
**Mr. Bernado Martinez**  
**Rue de la Loi / Wetstraat 200**  
**1049 Brussels**  
**BELGIUM**

Revision of the Ecodesign Directive (EU) 2015/1185 for solid fuel local space heaters

Dear Sir or Madam,

In light of the ongoing revision of the EU Ecodesign Directive (hereinafter “Ecodesign”), I declare that the “Polish Chimneys” Association opposes the changes related to tightening the requirements for solid fuel local space heaters, including fireplaces, as the proposed changes could lead to disproportionate regulations, generating excessive costs for SMEs and ultimately resulting in bankruptcies, decreased economic productivity, and increased unemployment. Such actions could also undermine the comfort of use and energy security of households.

Below are several important as well as critical points regarding the draft regulation.

#### **1. Lack of information and basis for assessment**

The draft regulation does not contain specific justification (grounds) and is not based on a proper impact assessment. This makes it difficult for stakeholders to evaluate the draft regulation. We believe that it is still too early to assess the effectiveness of the current Ecodesign regulations for solid fuel local space heaters, at least at the EU-wide level, as the Ecodesign only entered into force on January 1, 2022. Unfortunately, the EC has not yet presented an assessment of the effectiveness of the first Ecodesign, which seems to be a necessary condition for its revision.



stowarzyszenie  
kominy polskie

[www.kominypolskie.com.pl](http://www.kominypolskie.com.pl)

Adres siedziby:  
Stowarzyszenie „Kominy Polskie”  
ul. Wschodnia 24  
45-449 Opole

NIP: 547-18-83-272  
REGON: 072301122

Konto Bankowe: Bank Milenium SA o/Pszczyna 03 1160 2202 0000 0000 6808 4274

## **2. Test methods and limit values**

The proposed test methods for wood-burning local space heaters are completely inadequately described in terms of repeatability and validation. They also deviate from the harmonized standard EN 16510-x.

## **3. Economic impact**

The SME sector accounts for 95% of the EU. Small and medium-sized enterprises comprise approximately 11,000 businesses and provide 200,000 jobs. The proposed regulations mean significant additional costs that are unsustainable, especially for SMEs, and could lead to their bankruptcy.

## **4. Social impact**

More expensive appliances significantly increase the cost of heating EU citizens' homes, and consequently, deepening energy poverty.

More expensive new devices also mean a lack of motivation to replace old devices, which are primarily responsible for so-called low emissions. This will lead to a dramatic decline in the replacement of existing, old appliances across Europe.

In Polish climate conditions, space heating is an absolute necessity. Every citizen has the right to use heating. Building Law and other relevant local regulations must ensure the proper conditions and prerequisites for the full exercise of this right. Under the proposed changes to Ecodesign regulations, individual users are often left out in this matter, or even incapacitated, because they lack the freedom to choose their heat source.

## **5. Energy security**

Fireplaces provide a reliable and emergency heat source, independent of the electricity or gas grid. In the event of a failure of these systems, they maintain basic thermal comfort, ensuring energy security for residents.



stowarzyszenie  
kominy polskie

[www.kominypolskie.com.pl](http://www.kominypolskie.com.pl)

Adres siedziby:  
Stowarzyszenie „Kominy Polskie”  
ul. Wschodnia 24  
45-449 Opole

NIP: 547-18-83-272  
REGON: 072301122

Konto Bankowe: Bank Milenium SA o/Pszczyna 03 1160 2202 0000 0000 6808 4274

## **6. Use of renewable energy sources**

Wood, as biomass, is recognized by the European Union as a renewable energy source. Promoting modern, low-emission wood-burning appliances aligns with the goals of the European Green Deal, contributing to the reduction of fossil fuel consumption. Introducing and tightening requirements for fireplaces will limit the use of wood as a renewable energy source. Furthermore, it eliminates the possibility of applying the principles of the circular economy (CE) in the wood sector, which means we miss the opportunity to minimize the consumption of natural resources and maximize the use of existing materials through reuse, renovation, and recycling.

## **7. Supporting the local economy**

The European fireplace industry is largely comprised of small and medium-sized enterprises (SMEs), which create jobs and contribute to the development of local economies. Overly rapid and unjustified tightening of regulations could lead to the bankruptcy of many companies and the loss of thousands of jobs across Europe, including Poland.

## **8. Technological progress and emission reduction**

The fireplace industry has made enormous technological progress in recent years. Appliances that meet Ecodesign standards are characterized by high efficiency and significantly reduced pollutant emissions compared to older models. Further, evolutionary improvement of the technology is possible, but changes in research methodology and emission limits, unsupported by reliable analyses, may prove to be an insurmountable barrier for manufacturers.

## **9. Education on proper combustion**

Education on proper combustion should be an important element in reducing so-called low emissions. This applies to both wood preparation (seasoning) and the actual process of lighting and burning in local space heaters. Experience has shown that emissions can be significantly reduced by intensifying educational efforts. Examples of sound educational policies in this area include Germany, Austria, and Switzerland.



stowarzyszenie  
kominy polskie

[www.kominypolskie.com.pl](http://www.kominypolskie.com.pl)

Adres siedziby:  
Stowarzyszenie „Kominy Polskie”  
ul. Wschodnia 24  
45-449 Opole

NIP: 547-18-83-272  
REGON: 072301122

Konto Bankowe: Bank Milenium SA o/Pszczyna 03 1160 2202 0000 0000 6808 4274

## Summary

The new regulation will lead to a loss of confidence in the idea of Ecodesign.

The introduction of impossible-to-meet energy efficiency thresholds or pollutant emission limits will limit the use of wood-burning local space heaters and wood itself as fuel. This, in turn, will lead to reduced energy security for residents and increased energy poverty. EU policy should be aimed at replacing old appliances with modern, low-emission renewable energy devices.

President

of the “Polish Chimneys” Association

Roman Nowak