

Joint Actions on Harmonised Products 2022

Pellet Stoves (WP3)

Project number: JA2022-2-02

Project acronym: JAHARP2022-02

Brussels, 06.12.2023

1 Introduction

In the framework of Joint Market Surveillance Action on harmonised products JAHARP2022-02, which commenced in September 2023, one of the product activities (Work Package 3) concerns pellet stoves. This is a project co-funded by the European Union and coordinated by PROSAFE and it involves Market Surveillance Authorities (MSAs) of Czech Republic, Finland, and Portugal.

The main objective of this project is to ensure that pellet stoves on the EU market meet the requirements of the EU Energy Label (2015/1186) and the EU Ecodesign Regulation (2015/1185) are removed from the Single Market. Regulation (EU) 305/2011 on Construction Products also applies to pellet stoves, although this is not within the project scope.

As part of the project, a number of pellet stoves will be sent to an accredited lab for testing. PROSAFE will send out a formal invitation to tender, during the 1st half of 2024, for the purposes of selecting a laboratory(ies) for this testing.

The energy label for Pellet Stoves indicates their energy efficiency on a scale from A++ (most efficient) to G (least efficient), which has been mandatory since 1st January 2018. The label provides information on brand, model, energy efficiency class, direct and, if applicable, indirect heat output in kW, which measures the heat transferred to a liquid (for hot water circulating in radiators or for a central heating system).

The eco-design requirements have been mandatory since 1 January 2022 and deal with energy efficiency (seasonal space heating energy efficiency), emissions of particulate matter, organic gaseous compounds, carbon monoxide and nitrogen oxides.

The energy labelling and ecodesign regulations are now under revision and the completion of this revision work is expected in 2024, with implementation expected from 2025.

PROSAFE would like to collect data from laboratories about testing information such as any known issues with the standards used to measure pellet stove performances, indicative pricing¹ and duration of testing.

To facilitate this information gathering PROSAFE have developed this short questionnaire. PROSAFE would appreciate any assistance that you are willing to provide.

This invitation does not entail any commitment, financial or otherwise, on the part of PROSAFE or of responders: it serves as a non-binding, informal instrument for the purposes of collecting information on the availability of services. The prices shall be kept confidential and will allow us to assess the size of the sampling versus the budget available.

It should be stressed that this invitation does not constitute a public procurement procedure in the sense of Directive 2014/24/EU.

2 Further Information

If there are questions about the questionnaire, please contact Mrs Ioana Sandu, Executive Director, at ioana@prosafe.org, to Mr Mario Arigliani, Project and Policy Officer, at mario@prosafe.org and to Mr Jonathan Wood, PROSAFE Facilitator, at jonathan.wood@tenvic.com.

¹ PROSAFE understand that any indicative pricing is provided as an approximation only to aid with project planning and in no way obligates laboratories to maintain this pricing during the tendering process.

3 How to submit

To submit the questionnaire, please fill in the tables below and return it by e-mail to the PROSAFE Office addressed to Mrs Ioana Sandu, Executive Director, at ioana@prosafa.org, to Mr Mario Arigliani, Project and Policy Officer, at mario@prosafa.org and to Mr Jonathan Wood, PROSAFE Facilitator, at jonathan.wood@tenvic.com, by 8 January 2024, 05:00 pm (CET).

4 Questionnaire

General Standards Question
1. Is your organisation aware of any issues with the standards or transitional methods used to measure the energy efficiency OR emissions of pellet stoves in line with requirements in the EU Energy Label Regulation (EU) 2015/1186 and Ecodesign Regulation (EU) 2015/1185? If, yes, please provide details.
2. Are you aware of any specific methods manufacturers are employing during testing to try and circumvent, or otherwise alter product performances against, the requirements in the EU Energy Label Regulation (EU) 2015/1186 and Ecodesign Regulation (EU) 2015/1186? If, yes, please provide details
Duration of Testing
3. What is the maximum number of pellet stoves you could test per week from January 2024 to December 2024?
4. On average, how many test cycles (including test cycles at nominal and, in its case, at partial load) do you carry out for each of the models tested?
5. On average, what is the total duration of the test, in hours (as a sum of the time for each of the test cycles performed)?
Number of samples required
6. How many units of each pellet stove do you require to test a single sample for the purposes of indicating a model's compliance status to the EU Energy Label Regulation (EU) 2015/1186 and Ecodesign Regulation (EU) 2015/1185? If different numbers of samples are required for each piece of legislation, please make that clear.
Indicative Pricing
<p>Please provide indicative pricing each of the testing requirements listed. It is understood that all applicable physical attributes of products required to determine compliance to legal requirements would also be recorded in test reports.</p> <p>If your laboratory does not provide testing/compliance checking for any parameter, please identify by listening "Not Available" in the appropriate box(es).</p> <p>Please list any excluded product types or product set up conditions and add separate pricing (where applicable) in brackets to cover these exclusions (Include details of any exclusions)</p>

EU Regulation(s)	Testing Parameter	Types of exclusion and separate pricing	Testing Cost Per Unit (€) to:		
			All Transitional methods as detailed ²	EN 16510-2-6:2023	Both approaches
COMMISSION REGULATION (EU) 2015/1185 of 24 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for solid fuel local space heaters: ANNEX II Ecodesign Requirements	1. Specific ecodesign requirements for seasonal space heating energy efficiency				
	2. Specific ecodesign requirements for emissions				
COMMISSION DELEGATED REGULATION (EU) 2015/1186 of 24 April 2015 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the energy labelling of local space heaters	Energy efficiency index (EEI), Energy Efficiency Class, the direct heat output in kW & for local space heaters with heat transfer to a fluid, the indirect heat output in kW				
EU Energy Label Regulation (EU) 2015/1186 and Ecodesign Regulation (EU) 2015/1186	All Ecodesign and Energy Labelling Requirements				

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² [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017XC0310\(04\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017XC0310(04))