

OPINION

EuP - THE EUROPEAN PERSPECTIVE

Mark Edwards, Chairman of the association of the European Heating Industry, considers the consequences and effectiveness of forthcoming European legislation on the UK heating market.



Current discussions with the European Commission indicate that the Eco design of Energy using Products (EuP) regulation due to come into force in 2009 will cover all heating appliances providing heating through a water-based system for both residential and commercial (>70kw) applications.

Implementation is expected to take the form of a 'system label' similar to the current energy efficiency labels used for white goods e.g. washing machines and fridges. The label is expected to be a uni-label covering all forms of primary energy i.e. oil/gas/electric. Boiler and system efficiency will be based on a new, untried, model which has been developed by consultants appointed by the Commission. This will replace existing SEDBUK, CEN etc efficiency rating systems.

Simple, clear, effective. But for whom?

The European Commission's target for the regulation is the consumer. The new labeling system is intended to "make it easy for the consumer to choose his new heating system driven by energy efficiency". The consultant's

model assumes standard housing types, which means UK housing stock is considered to be similar to housing stock across Europe. I wish the consultants good luck in their definitions and also their relationship to the real world.

Who exactly is the consumer that is being targeted, and who exactly makes the final purchasing decision? The end customer is the final link in a chain starting with manufacturer, distributor/merchant and ending with heating engineer/installer. Does the end customer decide on his replacement system - boiler/radiator/thermostats/controls/solar panel? Not to my knowledge.

Does such a labeling system help the heating engineer/installer? Well in a limited way, the answer must be yes. However for the consumer, the label does not refer to his primary energy source, be it oil, gas or electric, and is based on a standard house. How does the installer 'translate' this for the benefit of the consumer? What if the consumer only has a budget for the boiler and not for the upgrade of the rest of the system?

The manufacturer bears responsibility for applying the label to his boiler to show how it operates in a theoretical system - who has the responsibility for ensuring that the optimal system is delivered in the field? The real world of distress purchases and budgetary limits

does not provide the basis for the proposals to have credibility.

In addition to this, the uni-label covers the whole of Europe, regardless of climate (so a house in Germany is considered to have the same energy usage as a house in Greece), and ignores existing legislation, such as the UK's programme for zero carbon houses or the existing SEDBUK scheme.

The message from the association of the European Heating Industry has been clear:

- all new boilers sold today are at least 20% more efficient than the average installed product, therefore simple replacement will achieve the European objective of a 20% improvement in energy efficiency by 2020
- we will support a labeling approach based on best available technology but which distinguishes between primary energy sources
- if the government wishes to accelerate improving energy efficiency in houses, it needs to compensate end-users for the increased costs
- the move to renewables - solar, heat pumps etc. - can further increase efficiency. Many boiler manufacturers offer these systems but the cost without government subsidy is not economic.

Ultimately, the focus must be on maintaining the level of replacement boilers being installed. ●

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