POSITION PAPER

December 2012

Local Space Heaters (Lot 15 and Lot 20)

National representatives from Denmark and Norway share some concern about the dust measuring protocol to be applied in the ecodesign framework.

We all appreciate the environmental protection potential given by this framework, at the same time setting high standards for the energy saving potential. However, without an equal challenging dust measuring protocol Europe might not harvest the full potential of the proposed emission limits.

We would like to point out some attributes which in our opinion is crucial to the ecodesign dust measuring, in order to narrow in the gap between laboratory test conditions and real life usage patterns among consumers.

The ecodesign dust test protocol should support:

- Use of a realistic fuel load utilizing the firebox capacity
- Testing also under low heat output conditions
- Testing also under attempted consumer misuse conditions
- Dissipation of as well solid matter as condensable from the flue gas
- Testing under forced flue draft conditions
- Repeating tests to rule out a lucky punch

We are aware that none of the current common used test protocols have got all these characteristics, but we find that any test protocol can be modified to deliver at least some of them before adaption of the ecodesign framework from 2015, and all of them to a mid-way review in 2018.

Contact persons:

Charlotte von Hessberg, Danish Environmental Protection Agency, chste@mst.dk

Einar Tommelstad, Norwegian Water Resources and Energy Directorate, ejrt@nve.no