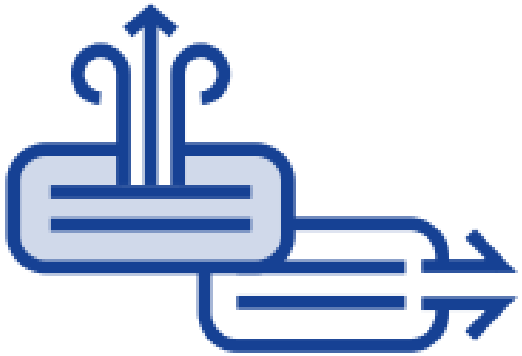
New ecodesign regulation for local space heaters

Webinar for suppliers

November 5th, 2025



Local Space Heaters

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Agenda

- Opening remarks and introduction
- New ecodesign requirements for local space heaters
- Energy labelling requirements
- EPREL database
- Market surveillance
- Questions and Answers

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SPEAKERS

Moderator

Ms. Joana Fernandes, ADENE, Portugal

Guest speakers

Mr. Bernardo Martinez, European Commission

Mr. Ian Kingscott, CEFACD

Speakers / co-organisers

Mr. Franz Zach, AEA, Austria

Mr. Juraj Krivosik, SEVEn, Czechia

Ms. Elisabeth Dreier, vores bureau, Denmark

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New ecodesign regulation
Local Space Heaters

Mr. Bernardo Martinez, European Commission –
Policy Officer, European Commission,
Directorate General for Energy

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Local space heaters

Obligations regarding ecodesign

Webinar 5-11-2025

Scope

European Commission

Legal framework

- *Regulation (EU) 2024/1103*
- *Requirements on*
  - Energy efficiency thresholds
  - NOx emissions
  - Low power modes
  - Information requirements
  - Availability of spare parts
- *Newly in the scope*
  - Slave heaters (LSHs placed on the market without control)
  - Separate related controls
  - Towel rails
  - **Portable** visibly glowing
- *Out of the scope*
  - Exclusively for outdoor use
  - Air heating products
  - Sauna stoves
  - Cooking appliances

Date of application: 1 July 2025

Performance requirements

- *Energy efficiency thresholds*
- *NOx emissions limits*
- *Low power modes*
  - Off mode: 0,5 W and 0,3 W as from 9 May 2027
  - Standby: 0,5 W, 1 W with display of information or status, 2 W networked
  - Idle mode: 1 W and 3 W networked.

LSHs without control and separate related controls

- *LSHs may be placed on the market without control, but…*
- *…the pair LSH-control must comply with the Regulation*
- *They will not be able to provide heat without control*

European Commission

Product information: LSHs

- *To be provided in instructions for installers and users, and free access websites*

Table 3: Information requirements for electric local space heaters

Contact details	Name and address of the manufacturer or its authorised representative.				
Model identifier(s):					
Item	**Symbol**	**Value**	**Unit**	**Item**	**Unit**
Heat output				**Type of heat output / room temperature control (select one)**	
Nominal heat output	P_{nom}	x,xxx	kW		[yes/no]
Minimum heat output (indicative)	P_{min}	[x,xxx / N.A.]	kW	single stage heat output and no room temperature control	[yes/no]
				two or more manual stages, no room temperature control	[yes/no]
Maximum continous heat output	$P_{max,c}$	x,xxx	kW	with mechanic thermostat room temperature control	[yes/no]
				with electronic room temperature control	
Power consumption				electronic room temperature control plus day timer	[yes/no]
In off mode	P_o	x,xx	W	electronic room temperature control plus week timer	[yes/no]
In standby mode	P_{sm}	x,xx	W		[yes/no]
In idle mode	P_{idle}	x,xx	W	**Other control options (multiple selections possible)**	
In network standby	P_{sm}	x,xx	W		[yes/no]
Standby mode with display of information or status			[yes/no]	room temperature control, with presence detection	[yes/no]
				room temperature control, with open window detection	[yes/no]
Seasonal space heating energy efficiency in active mode	$\eta_{s,on}$	x,x	%	distance control option	[yes/no]
				adaptive start control	[yes/no]
				working time limitation	[yes/no]
				black bulb sensor	[yes/no]
				self-learning functionality	[yes/no]
				control accuracy	[yes/no]

Table 4: Information requirements for electric local space heaters placed on the market without control

This product needs a control to comply with the mandatory ecodesign requirements set out in Regulation (EU) 2024/1103					
Contact details	Name and address of the manufacturer or its authorised representative.				
Model identifier(s):					
Item	**Symbol**	**Value**	**Unit**	**Item**	**Unit**
				Control functions necessary to comply with the mandatory ecodesign requirements set out in Regulation (EU) 2024/1103	
Heat output				**Type of heat output/room temperature control (select one)**	
Nominal heat output	P_{nom}	x,xxx	kW	single stage heat output and no room temperature control	[yes/no]
Minimum heat output (indicative)	P_{min}	[x,xxx / N.A.]	kW	two or more manual stages, no room temperature control	[yes/no]
Maximum continous heat output	$P_{max,c}$	x,xxx	kW	mechanic thermostat room temperature control	[yes/no]
				electronic room temperature control	[yes/no]
				electronic room temperature control plus day timer	[yes/no]
				electronic room temperature control plus week timer	[yes/no]
				Other control options (multiple selections possible)	
				presence detection	[yes/no]
				open window detection	[yes/no]
				distance control option	[yes/no]
				adaptive start control	[yes/no]
				working time limitation	[yes/no]
				black bulb sensor	[yes/no]
				self-learning functionality	[yes/no]
				control accuracy	[yes/no]

Product information: separate related controls

Table 6: Information requirements for separate related controls

Contact details	Name and address of the manufacturer or its authorised representative.
Model identifier(s):	

Item	Symbol	Value	Unit
Power consumption			
In off mode	P_o	x,xx	W
In standby mode	P_{sm}	x,xx	W
In idle mode	P_{idle}	x,xx	W
In networked standby	P_{nsm}	x,xx	W
Standby mode with display of information or status		*[yes/no]*	

Item	
Type (select one)	
	[yes/no]
single stage heat output and no room temperature control	[yes/no]
two or more manual stages, no room temperature control	[yes/no]
mechanic thermostat room temperature control	[yes/no]
electronic room temperature control	[yes/no]
electronic room temperature control plus day timer	[yes/no]
electronic room temperature control plus week timer	[yes/no]
Other control options (multiple selections possible)	
	[yes/no]
presence detection	[yes/no]
open window detection	[yes/no]
distance control option	[yes/no]
adaptive start control	[yes/no]
working time limitation	[yes/no]
black bulb sensor	[yes/no]
self-learning functionality	[yes/no]
control accuracy	[yes/no]

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Product information: LSHs placed on the market w/control and separate related controls

- *This product … needs to be complemented with a control providing at least the following control functions: TC (f1/f2/f3/f4/f5/f6/f7/f8)*
- *'This control has the following control functions': TC (f1/f2/f3/f4/f5/f6/f7/f8), …*

Table 7: Control function codes

		Code of temperature control (TC)	Control functions							
			f1	f2	f3	f4	f5	f6	f7	f8
Type of temperature control	Single stage, no temperature control	NC								
	Two or more manual stages, no temperature control	TX								
	Mechanic thermostat room temperature control	TM								
	Electronic room temperature control	TE								
	Electronic room temperature control plus day timer	TD								
	Electronic room temperature control plus week timer	TW								
Control functions	Presence detection		1							
	Open window detection			2						
	Distance control option				3					
	Adaptative start control					4				
	Working time limitation						5			
	Black bulb sensor							6		
	Self-learning functionality								7	
	Control accuracy with CA < 2 Kelvin and CSD < 2 Kelvin									8

Example: LSH coupled to electronic room temperature control plus day timer, with open window detection and working time limitation: TD (0/2/0/0/5/0/0/0).

Amendment

- *Inclusion of fan heaters*

- *Inclusion of portable heaters plugged directly to the wall*

- *Avoid portable visibly glowing heaters be considered as fix when sold with fixing elements (safety)*

European Commission

Thank you

Opening remarks

Mr. Ian Kingscott, CEFACD –
Vice President for Gas and Electric Local Space Heaters,
European Committee of Manufacturers of Domestic Heating and Cooking Appliances

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ECODESIGN GAS AND ELECTRIC LSH

5th November 2025

Ian Kingscott

CEFACD Vice President - Gas

CEFACD – your European Trade Federation

- Comité Européen des Fabricants d'Appareils de Chauffage et de Cuisine Domestiques (European Committee of Manufacturers of Domestic Heating and Cooking Appliances)
- Your European Trade Federation for the individual heating and cooking appliance industry
- Covers appliances fueled by wood, pellets, gas and electricity
- Membership includes national trade associations and manufacturers.

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CEFACD aims

Active for over 25 years but reformed in 2017;

- **Represent and promote efficient and environmentally friendly individual heating and cooking appliances**
- **Safeguard the supranational interests of members as appropriate**
- **Represent and promote members' common economic, technical and political interests before the European Commission, European Council and European Parliament**
- **Co-operate with professional associations with a view to investigating common economic and technical issue.**

UN Sustainable Development Goals **

Ecodesign for Local Space Heaters - The positive impact.

C.E.F.A.C.D

Generally, Ecodesign is regarded as a positive tool to ensure there is a level playing field across the European Union and help regulate manufacturers intending to supply into the European market.

By providing a balanced requirement, it encourages manufacturers to continually develop products to provide “state of the art” appliances.

The updating of Ecodesign should however, be a collaborative effort involving manufacturers, testing authorities, consultants and the European Commission. This will ensure the regulation pushes the boundaries of technology whilst also ensuring that the requirements are reasonable and do not result in excessive additional costs for the manufacturer or end user.

Ecodesign for Local Space Heaters- The impact on manufacturers.

C.E.F.A.C.D

There are, however, some aspects that have taken manufacturers by surprise in the 2024 update as there was little or no discussion in the stakeholder meetings nor in the consultant's draft report:

1. **Reclassification of different gas appliance categories**
2. **Decrease in allowable NOx emissions**
3. **Different methodology of efficiency calculation**
4. **Decrease in efficiency requirement offset by new calculation method**
5. **Introduction of test procedures whereas these have previously been governed by the applicable European standards**

Impact On Manufacturers

Reclassification of different appliance categories:

1. Open Fronted Local Space Heaters

2. Closed Fronted Open Combustion Local Space Heaters

3. Closed Fronted Closed Combustion Local Space Heaters

In the previous version of Ecodesign in force from 2018 – 2025, there were two efficiency requirements:

42% - Open Combustion Local Space Heater – applicable to categories 1 and 2

72% - Closed Combustion Local Space Heaters – applicable to category 3

In the 2025 version of Ecodesign, Closed fronted, Open combustion LSH were reclassified, and the efficiency requirements were combined with Closed combustion despite discussions taking place to explain the difficulties in achieving this. This has put a greater burden of redevelopment on manufacturers.

Impact On Manufacturers

Decrease in allowable NOx emissions:

During the stakeholder meetings, there was no mention of reducing the allowable NOx value from 130mg/m^3 to 120 mg/m^3.

There is very little scope to further reduce the NOx values as to do so, would require reducing the decorative nature of the flame effect which is pivotal to the look of decorative gas local space heaters.

This has led to a greater burden on manufacturers in redevelopment and retesting time and cost. It has also in some cases, necessitated an increase in cost to the customer although the regulation states that the requirements should not “place undue burden or expense on the manufacturer or increase the appliance costs to the end user”.

Impact On Manufacturers

Different methodology of efficiency calculation:

The changes to the efficiency calculation will result in lower seasonal efficiency figures being published. This will lead to further confusion as potential customers are already confused by the various figures being quoted.

A manufacturer of Local Space Heaters currently measures three different efficiencies:

1. The nominal efficiency on which to base the calculations for seasonal efficiency.

2. The seasonal efficiency as calculated using the Ecodesign guidance.

3. The efficiency quoted on the Energy Efficiency Label which is different as the labelling regulation has not been updated at the same time as Ecodesign.

As the nominal efficiency must be declared in the literature which accompanies the appliance, the customer is faced with two efficiency claims in the Ecodesign table and another in the labelling product fiche. It is difficult to explain to a customer why there are different efficiencies when an appliance can only produce one true efficiency. Customers are confused by this information.

Impact On Manufacturers

Decrease in efficiency requirement offset by new calculation:

As the new Ecodesign calculation produces a lower seasonal efficiency, this does not truly reflect the actual efficiency of the appliance and when compared to other appliances, it gives an unfair comparison which could eventually eliminate the manufacture of Gas and Electric Local Space Heaters.

Local space heaters should be regarded as a fundamental part of the transition to clean renewable energy. Local space heaters provide instant warmth in the room in which they are located thus reducing the need to heat the entire home during Spring and Autumn. This saves money and reduces emissions by not having to use central heating systems.

Impact On Manufacturers

Introduction of new test methods which have previously been covered by the relevant European standards:

The 2024 revision of Ecodesign introduced test methods that had previously been covered by the applicable European standards. We now have two methods of measuring gas LSH efficiency, one to satisfy the requirements of the relevant European standard (EN:613) and the new method described in the Ecodesign Annex. This results in duplication of tests to satisfy both measurement methods. CEFACD have lobbied to have the standard updated to use common measurement methods, but this has so far, been declined. We continue to lobby for this to eradicate duplication of tests which incur increased development and certification costs.

Conclusion

Ecodesign is pivotal to ensure the continued advances in Technology for Local Space Heaters but greater future collaboration with both Industry and Approval bodies would be welcomed.

Thank you

Ecodesign requirements for local space heaters

Mr. Franz Zach, AEA –
Senior Expert - Energy Economics,
Compliance Services project coordinator,
Austrian Energy Agency

Local Space Heaters

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Issues covered

- Applicability dates
- Old and new ecodesign requirements
- Scope
- Efficiency
  - 5 correction factors
  - Calculation examples
- Control features
- Low power mode
- Emissions
- Spare parts

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From when is the new ecodesign regulation applicable?

- Almost all ecodesign provisions apply to *units* of models placed on the market from 1st of July 2025 onwards.
- Only the provision on circumvention has been applicable for units of models placed on the market since the 9th of May 2024.
- The provisions on energy labelling (and the scope) are in place and remain valid until there is a new regulation (no timing yet known).

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What has changed from old to new ecodesign regulation? An overview

- A broader scope
- Changed minimum requirements
- A lower conversion coefficient (CC) for electricity
- New calculation methods
- New information requirements
- Low power modes requirements
- New emission requirements for nitrogen oxides
- Requirements for control accuracy and control to setpoint deviation
- Requirements aimed at protecting consumers (circumvention and software updates)
- Requirements ensuring better repairability of products (e.g. spare parts) and recyclability

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Which products are in scope? What has changed?

- Domestic local space heaters (LSH): Nominal heat output up to 50 kW (unchanged)
- Commercial LSH: Nominal heat output increased from 120 to 300 kW.
- New in scope:
  - LSH placed on the market without control; requirements for separate-related controls introduced.
  - Slave heaters.
- Not in scope anymore:
  - Cooking appliances.
- Never been in scope:
  - LSH using a vapour compression cycle for the generation of heat driven by electric compressors or fuel
  - LSH that are specified for outdoor use only
  - LSH in which the direct output is less than 6 % of the combined direct and indirect heat output at nominal heat output – e.g. boilers with heat loss of not more than 6 % → (EU) 813/2013.
  - Air heating products
  - Sauna stoves

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Types of domestic and commercial LSH

Domestic LSH:

- Open fronted LSH and open to chimney LSH
- Closed fronted open combustion LSH
- Balanced flue LSH
- Electric LSH (fixed and portable)
- Electric storage LSH
- Electric underfloor LSH
- Electric visibly glowing radiant LSH (fixed and portable)
- Towel rails (were electric fixed LSH, now separate)

Commercial LSH:

- Luminous LSH
- Tube LSH

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Efficiency requirements

Important change:

The electricity conversion factor CC has decreased from 2,5 to 1,9 → Electric LSH now seems more efficient compared to gaseous and liquid fuel LSH than under (EU) 2015/1188.

CC = 1 for liquid and gaseous fuel LSH (unchanged).

Values between the old and the new regulation are difficult to compare, because the correction factors F(1) to F(5) have changed.

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Efficiency requirements

Electric LSH	Minimum η_s (%) Old regulation (EU) 2015/1188	Minimum η_s (%) New regulation (EU) 2024/1103
d. Electric portable LSH	36,0	44,7
e. Electric fixed LSH with nominal heat output P_{nom} > 250 W	38,0	47,5
f. Electric fixed LSH with $P_{nom} \leq$ 250 W	34,0	43,1
g. Electric storage LSH	38,5	47,3
h. Electric underfloor LSH	38,0	47,5
Electric radiant LSH (absent in 2024/1103; limited use)	35,0	-
i. Electric visibly glowing radiant LSH with P_{nom} > 1,2 kW	35,0	46,8
j. Electric visibly glowing radiant LSH with $P_{nom} \leq$ 1,2 kW	31,0	40,5
k. Electric visibly glowing radiant portable LSH (new in (EU) 2024/1103)	31,0 resp. 35,0	39,5
n. Towel rails with P_{nom} > 250 W (new in (EU) 2024/1103)	38,0	46,0
o. Towel rails with P_{nom} > 60 W (were under electric fixed LSH in (EU) 2015/1188)	34,0	42,1

Efficiency requirements

Commercial LSH	Minimum η_s (%) Old regulation (EU) 2015/1188	Minimum η_s (%) New regulation (EU) 2024/1103
l. Luminous LSH	85,0	90,0
m. Tube LSH	74,0	80,0

Liquid/gaseous fuel LSH	Minimum η_s (%) Old regulation (EU) 2015/1188	Minimum η_s (%) New regulation (EU) 2024/1103
a. Open-fronted LSH (in (EU) 2024/1103 also open to chimney LSH)	42,0	40,3
b. Closed fronted open combustion LSH	42,0	63,6
c. Balanced flue LSH	72,0	63,6

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POLL

Are individually manufactured electronic single-room heating units that are permanently fixed to the building in scope of the ecodesign regulation?

- Yes, if they are manufactured in the EU
- Yes, if they meet all other criteria
- Not anymore, but they were in the old regulation
- No, they were never in scope
- Do not know / Do not want to answer

The correct answer is: Yes, if they meet all other criteria.

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Calculation of the seasonal space heating efficiency

Non-commercial LSH

$$\eta_S = \eta_{th,nom} * (0{,}75 + F(2) + F(3)) * F(4) * F(5) / CC$$

where:

- $\eta_{th,nom}$ = useful efficiency at P_{nom} based on NCV (100% for electric LSH)

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Calculation of the seasonal space heating efficiency

Commercial LSH

Luminous LSH

$$\eta_S = 0{,}856 * \eta_{S,RF} - F(1) - F(4) - F(5)$$

Tube LSH

$$\eta_S = ((0{,}15 * \eta_{th,nom} + 0{,}85 * \eta_{th,min}) - F_{env}) * ((0{,}94 * RFS) + 19) / (0{,}46 * RFS) + 45) - F(1) - F(4) - F(5)$$

Where:

- $\eta_{th,nom}$ / $\eta_{th,min}$ = useful (thermal) efficiency at nominal/minimum heat output (P_{nom} / P_{min}) based on GCV (100% for el. LSH)
- Envelope losses (0% if tube in heated space, else 2,2 to 6,0%)
- RFS =
  share of infrared output in relation to input (15% weight on P_{nom} and 85% on P_{min})

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Correction factors to η_S

- η_S is reduced by
  - F(1) (commercial LSH) options for the heat output:
    - Single stage LSH: 5%
    - Two stage: 2,5 to 5%, depending on stage power relation
    - Modulating: 0 to 5%, depending on lowest power

    (In regulation (EU) 2015/1188 F(1) also accounted for a positive contribution to η_S of electric storage LSH due to adjusted contributions for options for heat storage and output.)
  - F(4) auxiliary electricity consumption
  - F(5) energy consumption of a permanent pilot flame

- η_S is increased by controls of indoor heating comfort (e.g. thermostats, start or distance control, self-learning, etc.)
  - F(2): Mutually exclusive values, i.e. cannot be added (0 to 0,19)
  - F(3): Values can be added to each other (up to 0,04)

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Circumvention

- LSH or separate related controls shall not alter their behaviour or properties when tested, in order to obtain a better result for any declared value.
- Suppliers shall not prescribe test instructions for lab tests of LSH or separate related controls which would alter their behaviour or properties in order to obtain a better result for any declared value.
- LSH or separate related controls shall not alter their behaviour or properties within a short period after being placed on the market / put into service resulting in a degrading of any declared value.

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Software updates

- Software or firmware updates shall not worsen any declared value of an LSH or separate related control when measured using the testing method applicable when placed on the market or put into service.

- No change (deterioration) of any declared value of an LSH or separate related control when measured using the testing method applicable when placed on the market or put into service shall occur because of rejecting the update.

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Control features

- Electric storage LSH shall be equipped with electronic heat charge control with room and/or outdoor temperature feedback and fan-assisted heat output.

- Towel rails with a nominal heat output equal to or below 60 W (which do not have a minimum efficiency requirement) shall only be operable through a working time limitation with a maximum pre-set period of no longer than 6 hours.

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New requirements for low power modes for LSH with controls and separate related controls

- Such LSH shall have an off-mode or a standby mode or both.
- Max. power consumption:
  - Off-mode (P_o): 0,5 W
    From May 9th, 2027: 0,3 W
  - Standby mode (P_{sm}): 0,5 W
  - Standby mode incl. display of information or status: 1 W
  - Standby mode providing connection to the network and networked standby (i.e. LSH can resume a function by a remotely initiated trigger from a network connection): 2 W
  - Standby mode with wireless communication between the heat generator and control or by powerline carrier: 3 W
  - If existent: Idle mode (P_{idle}) (average over 1 hour):
    - 1 W
    - If idle mode depends on the input from a network connection to automatically provide heat to the room: 3 W.

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Resource efficiency requirements (NEW)

- Regulation (EU) 2024/1103 contains completely new requirements on:
  - Availability of spare parts: Type of parts and timing
  - Maximum delivery time of spare parts
  - Content of repair and maintenance information
  - Access to repair and maintenance information
  - Requirements for dismantling for material recovery and recycling while avoiding pollution

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Availability of spare parts (1/2) – only electric LSH

Spare part	Electric portable and electric visibly glowing radiant portable LSH	Electric fixed LSH, towel rails and underfloor LSH	Electric storage LSH	Electric visibly glowing radiant LSH (not portable)
Control	Yes	Yes	Yes	Yes
Ambient thermostat	Only for electric portable LSH	Yes		
Motor for heaters equipped with a fan	Only for electric portable LSH			
Printed circuit boards	Yes	Yes		Yes
Display or status indicators	Yes	Yes	Yes	Yes
Impellers	Yes	Yes	Yes	Yes
Control sensors	Yes	Yes	Yes	Yes
Buttons and switches	Yes	Yes	Yes	Yes
Floor sensor		Only for electric underfloor LSH		

Availability of spare parts (2/2) – only electric LSH

Spare part	Electric portable and electric visibly glowing radiant portable LSH	Electric fixed LSH, towel rails and underfloor LSH	Electric storage LSH	Electric visibly glowing radiant LSH (not portable)
Repair kit for heating cables		Only for electric underfloor LSH		
Fixation brackets, if needed		Yes	Yes	Yes
Heating elements			Yes	Yes
Safety switches			Yes	
Connection cables			Yes	Yes
Housing for mechanical parts			Yes	
Fans			Yes	
Remote control sensors	Yes	Yes	Yes	Yes

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Availability of spare parts – only electric LSH

- From two years after placing the first unit on the market (remote controls and software from 1st of July 2025 in any case) until 10 years after placing the last unit of the model on the market, suppliers have to make available
  - Spare parts (see previous slides):
    Delivery within 10 working days after having received the order
  - List of spare parts and procedure for ordering them on a free access website
  - Indicative pre-tax prices at least in Euros and of fasteners and tools
  - For LSH using software: Software and firmware updates free of charge.
- Spare parts must be replaceable with commonly available tools without damaging the LSH.

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Content of repair and maintenance information

- Unequivocal LSH identification
- Disassembly map or exploded view
- Technical manual of instructions for repair
- List of necessary repair and test equipment
- Component and diagnosis information
- Wiring and connection diagrams
- Diagnostic fault and error codes
- Instructions for installation of relevant software and firmware including reset software
- Information on how to access data records of reported failure incidents stored on the local space heater
- Electronic board diagrams

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Access to repair and maintenance information

If you require professional repairers to register on the supplier website to request access, the following requirements apply:

- Before providing information, you can require that the professional repairer has:
  - The technical competence to do the repair
  - A liability insurance.
- You must either accept or reject (with clear justification) it within 5 working days.
- Registration must be free of charge, but you can charge a reasonable and proportionate fees for access.
- If you accept the request, you must provide access by the next working day – including for equivalent models or models in the same product family.

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Requirements for dismantling for material recovery and recycling while avoiding pollution

- Suppliers shall ensure that LSH are designed in such a way that the materials and components referred to in Annex VII to Directive 2012/19/EU of the European Parliament and the Council can be removed from the appliance with the use of commonly available tools.
- Suppliers shall according to Article 15(1) of Directive 2012/19/EU provide information free of charge about preparation for re-use and treatment for each LSH model within one year after first placement on the market containing data on components and materials and their location of dangerous substances and mixtures in LSH to be made available as manuals or electronic media (e.g. CD-ROM, online services) to centres preparing for re-use, treatment and recycling facilities.

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Max. NO_x emissions

- Max. emissions of nitrogen oxides (NO_x) of liquid and gaseous fuel LSH:

Product	Max. value of emissions of NO_x mg/kWh_{input} based on GCV	
	Old regulation (EU) 2015/1188	New regulation (EU) 2024/1103
Open fronted, open to chimney, closed fronted open combustion, balanced flue and flueless LSH	130*	120
Commercial LSH	200	180

** Please refer to the regulation for the definition of products.*

- NO_x is the sum of NO and NO_2.
- For (EU) 2024/1103:

  Space heating efficiency and NO_x must be measured at once.

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Product information requirements

- The information has to be available in instruction manuals for installers and users and on free access websites of suppliers.
- It must include:
  - The same parameters as in the tables for the technical documentation (Tables 1 to 6), but with the published values
  - Any precautions to be taken when the LSH is assembled, installed, or maintained
  - Information relevant to disassembly, recycling and/or disposal at end-of-life
  - Specific information sentences for some LSH types (Annex II.4.2)

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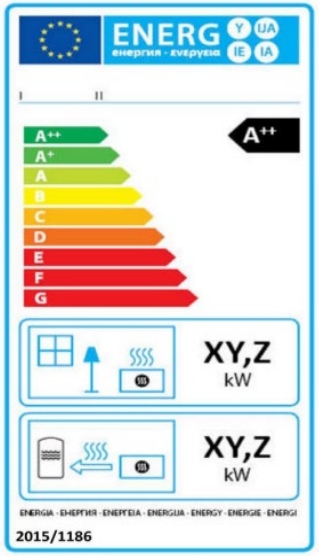
Energy labelling requirements for local space heaters (EU) 2015/1186



Local Space Heaters

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Energy labelling: Different scope than ecodesign

- **Note:** *Legislation fully in place since 2022, no changes.*
- LSH with a nominal heat output of 50 kW or less.
- The following products are not covered:

a) **Electric** LSH;
b) LSH using a vapour compression cycle or sorption cycle for the generation of heat driven by electric compressors or fuel;
c) Solid fuel LSH that are specified for the combustion of non-woody biomass only;
d) LSH specified for purposes other than indoor space heating to reach and maintain a certain thermal comfort of human beings by means of heat convection or heat radiation;
and others.
e) LSH that are specified for outdoor use only;
f) LSH of which the direct heat output is less than 6 % of the combined direct and indirect heat output at nominal heat output;
g) Solid fuel LSH that are not factory assembled, or are not provided as prefabricated components or parts by a single manufacturer which are to be assembled on site;
h) Luminous LSH and tube LSH (Note: **Commercial** LSH as defined in ecodesign)
i) Air heating products;
j) Sauna stoves.

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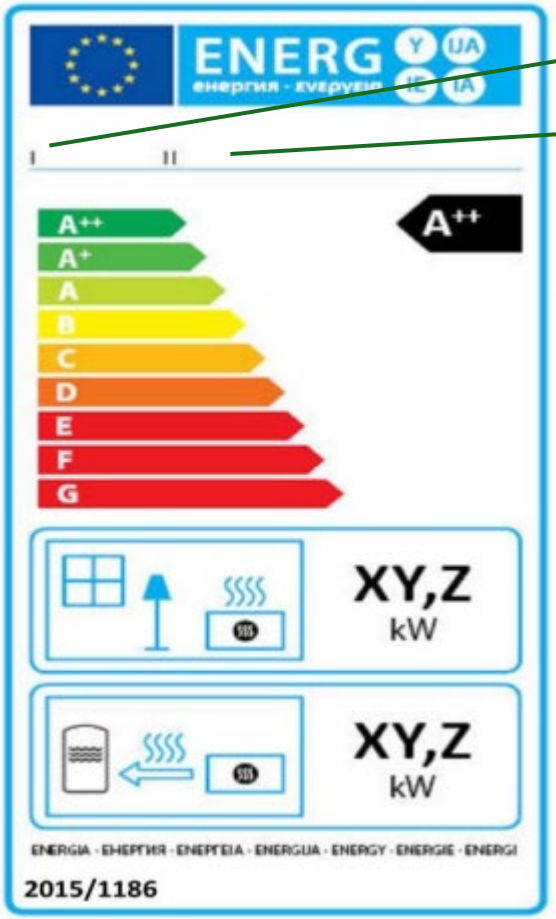
The energy label: Content



- Supplier's name or trademark
- Supplier's model identifier
- Energy efficiency class, determined according to Annex II.1
- The arrow with the energy efficiency class placed at the height of the relevant energy efficiency class on the scale A++ to G
- The symbol for direct heat output and its value in kW, rounded to the nearest one decimal place
- For LSH with heat transfer to a fluid, the symbol for indirect heat output and its value in kW, rounded to the nearest one decimal place.

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EEI – Energy Efficiency Index

Energy efficiency class	Energy efficiency index (EEI)
A++	≥ 130
A+	≥ 107
A	≥ 88
B	≥ 82
C	≥ 77
D	≥ 72
E	≥ 62
F	≥ 42
G	EEI < 42

The energy efficiency class of a LSH is determined by its energy efficiency index (EEI)

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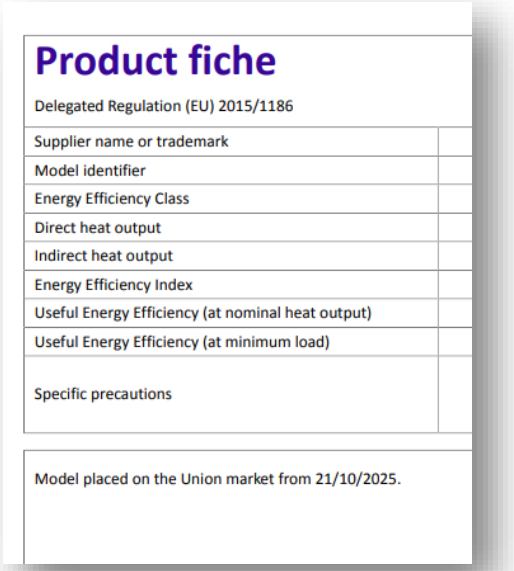
The product fiche



Product fiche

Delegated Regulation (EU) 2015/1186

Supplier name or trademark	
Model identifier	
Energy Efficiency Class	
Direct heat output	
Indirect heat output	
Energy Efficiency Index	
Useful Energy Efficiency (at nominal heat output)	
Useful Energy Efficiency (at minimum load)	
Specific precautions	

Model placed on the Union market from 21/10/2025.

- Supplier's name or trademark
- Supplier's model identifier
- The energy efficiency class of the model, determined in accordance with point 1 of Annex II
- The direct heat output in kW, rounded to the nearest one decimal place
- The indirect heat output in kW, rounded to the nearest one decimal place
- The energy efficiency index, rounded to the nearest integer and calculated in accordance with Annex VIII
- The useful energy efficiency at nominal heat output, and at minimum load if applicable, rounded to the nearest one decimal place and calculated in accordance with Annex VIII
- Any specific precautions that shall be taken when the LSH is assembled, installed or maintained.

Please note!

- One product fiche may cover several LSH models supplied by the same supplier.
- The information contained in the product fiche may be given in the form of a copy of the energy label, either in colour or in black and white. Where this is the case, the information listed above not already displayed on the energy label shall also be provided.

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Your obligations

- Each product shall be provided with an energy label and a product fiche (printed and electronic)

- Enter all data into the EPREL database
  - Energy label and product fiche – to be publicly available
  - Technical documentation – for authorities only

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Poll

If a dealer requires a new printed energy label and a printed product fiche from you?

- Do not provide printed material but refer them to EPREL
- Provide both within 5 working days
- Deliver it to them within a reasonable time
- I do not know / I prefer not to answer

The correct answer is: Provide both within 5 working days.

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Requirements for physical shops and trade fairs

- Ensure that all products displayed in a shop – whether unpackaged or not – bear the printed energy label on the outside of the front of the LSH, in such a way as to be clearly visible

- Provide the product fiche if the customer requests it.

- Display energy labels on products also in the shop's display windows.

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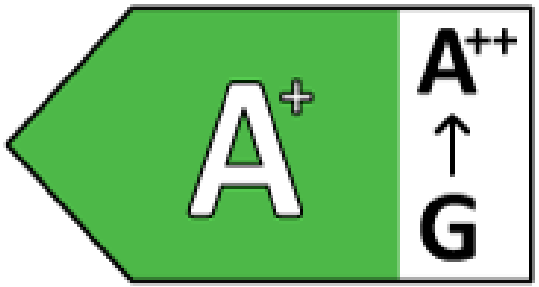
Requirements for online sales

- The energy label and the product fiche must be shown in proximity to the price of the product.
- It is permitted to show an energy arrow instead of the full energy label, and a link instead of the full product fiche, if the full energy label or the product fiche appears when the arrow or link is clicked on or hovered over.



- The energy arrow and the link to the product fiche must open with only one click. For the product fiche, you can also set a link directly to EPREL.
- The link for the product fiche must be named “Product fiche” (in the local language - as in the legislation)

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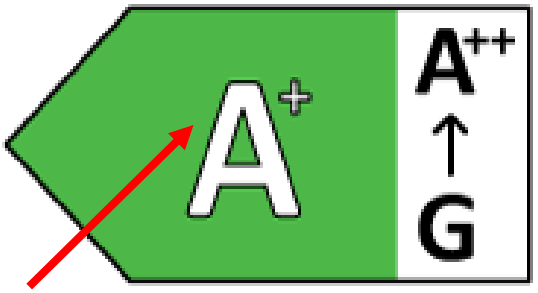
Requirements for online sales (2)

- The energy arrow must follow a specific layout and be of a size that ensures it is clearly visible and legible.
- The letter inside the arrow must be the same size as the price.
- Note!

  Use the new design of the energy arrow - not the one shown in the regulation (following a decision of the EU Court of Justice), and the A++ to G scale of classes



Please download the energy arrows here:
https://circabc.europa.eu/ui/group/7f4824e3-f72c-4126-b6b8-842a4443a4ca/library/17bc1987-e20e-49d5-a847-f7e28070c23b/details

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Information to be provided in cases where end-users cannot be expected to see the product displayed, except for online sales

The following information shall be provided in this order:

1. The energy efficiency class of the model.
2. The direct heat output in kW, rounded to the nearest one decimal place.
3. The indirect heat output in kW, rounded to the nearest one decimal place.

Please note!
The size and font of the above-mentioned information must be printed or shown so that it is legible.

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Technical documentation (ecodesign and energy labelling)

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Technical documentation

Energy labelling regulation

- ‘Technical documentation’ means documentation sufficient to enable the MSAs to assess the accuracy of the energy label and the product fiche of a product, including test reports or similar technical evidence.

Ecodesign regulation

- A technical documentation file making possible an assessment of the conformity of the product with the requirements of the applicable implementing measure must be compiled by the manufacturer

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Technical documentation (Ecodesign)

- The specific elements for LSH include (Tables 1 to 6)
  - Declared values according to tables in the regulation specific to:
    - (Non-commercial) Gaseous/liquid fuel LSH with controls
    - (Non-commercial) Gaseous/liquid fuel LSH without controls
    - (Non-commercial) Electric LSH with controls
    - (Non-commercial) Electric LSH without controls
    - Commercial LSH (with controls)
    - Separate controls
  - Calculations performed to obtain the declared values
  - If applicable: Calculations performed to obtain the declared values from another model, the accuracy assessment (+ Declaration of identity)
  - List of equivalent models
- The technical documentation is only available for market surveillance authorities (MSAs) (to be sent on request)
- Do not mix up measured, declared and published values! Values (CS-Portal)
- You can use the table layout in the regulation.

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Technical documentation (energy label)

Shall include:

- The name and address of the **supplier** and the **model** identifier
- Where appropriate, the references of the harmonised **standards** applied
- Where the preferred fuel is other woody biomass, non-woody biomass, other fossil fuel or other blend of biomass and fossil fuel as referred to in Table 2, a description of the **fuel** sufficient for its unambiguous identification and the technical standard or specification of the fuel, including the measured moisture content and the measured ash content, and for other fossil fuel also the measured volatile content of the fuel
- Where appropriate, the other technical **standards and specifications** used
- The identification and signature of the **person** empowered to bind the supplier
- The **information** included in Table 2 (for solid fuel local space heaters) and Table 3 (for gaseous/liquid fuel local space heaters), measured and calculated in accordance with Annex VIII
- **Reports of tests** undertaken by suppliers or on their behalf, including the name and address of the body that conducted the tests
- Any specific **precautions** that shall be taken when the LSH is assembled, installed or maintained
- A list of **equivalent models**, if applicable.

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EPREL

https://eprel.ec.europa.eu/screen/product/localspaceheaters

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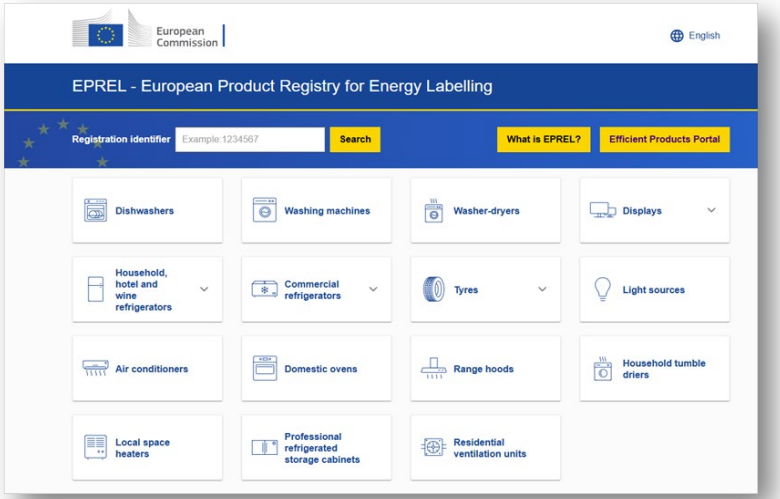
What is the EPREL database

EPREL = European Product Registry for Energy Labelling

- **Database** for all energy-labelled products
- **Mandatory**:

  Suppliers must verify their organisation, register their products and upload data before placing products on the market

- **Public part (accessible to everybody)**
  - **Designed to provide consumers, retailers etc. with detailed information and supplier contacts**
- **Compliance part (only accessible to Authorities)**
  - **Provides Market Surveillance Authorities an access to non-public product documentation**



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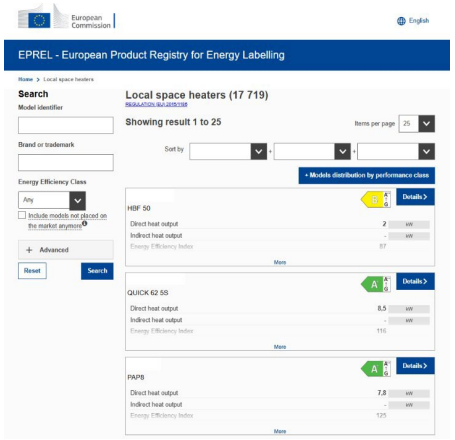
How to use EPREL

1. Note: No QR code on the product energy label for LSH (it is on newer product categories)

2. Go to the website: https://eprel.ec.europa.eu/screen/home:
   - Search for a specific model (by brand and model name or by registration number)
   - Choose a product group



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Registration of the model in EPREL

According to the energy labelling framework directive (EU) 2017/1369

General description of the model, sufficient for it to be unequivocally and easily identified, plus:

a) References to the harmonised standards applied or other measurement standards used
b) Specific precautions that shall be taken when the model is assembled, installed, maintained or tested
c) The measured technical parameters of the model
d) The calculations performed with the measured parameters
e) Testing conditions if not described sufficiently in point (b).

In addition, the supplier may upload additional parts of the technical documentation on a voluntary basis into EPREL.

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Advantages of using EPREL

A specific product

- Anyone (e.g. dealers) can download or print the energy label and the Product Fiche
  - This is important because customers have the right to request the product fiche.

- Please note!

  If you print an energy label from EPREL to place it on the product in the store, please ensure that the colours and the size match the original energy label, as any deviation may result in a fine issued by your national authority.

- When you examine a specific model (via the details button) you get additional information that is not present on the energy label.

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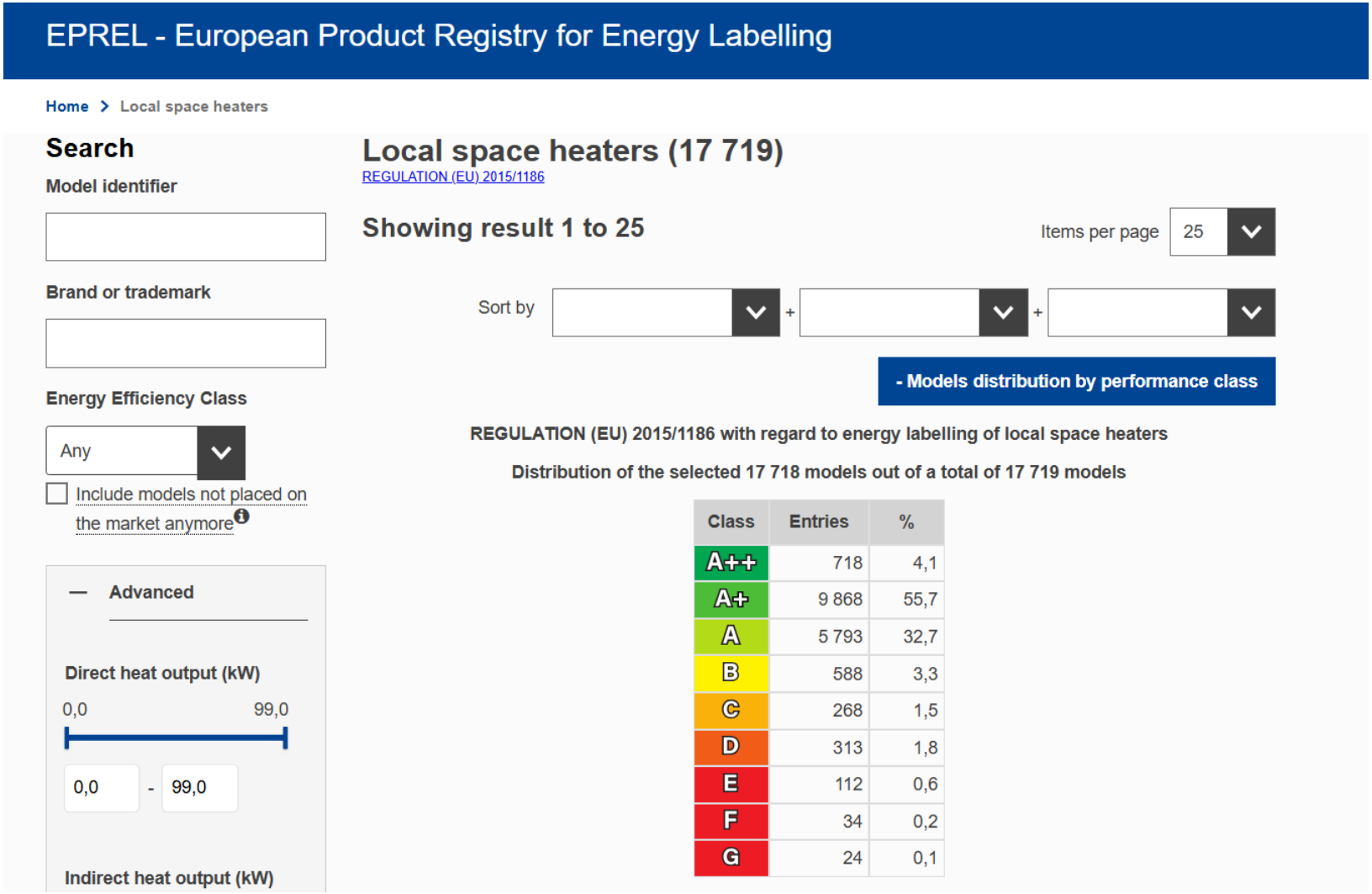
Advantages of using EPREL



Class	Entries	%
A++	718	4,1
A+	9 868	55,7
A	5 793	32,7
B	588	3,3
C	268	1,5
D	313	1,8
E	112	0,6
F	34	0,2
G	24	0,1

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Verification of a supplier in EPREL

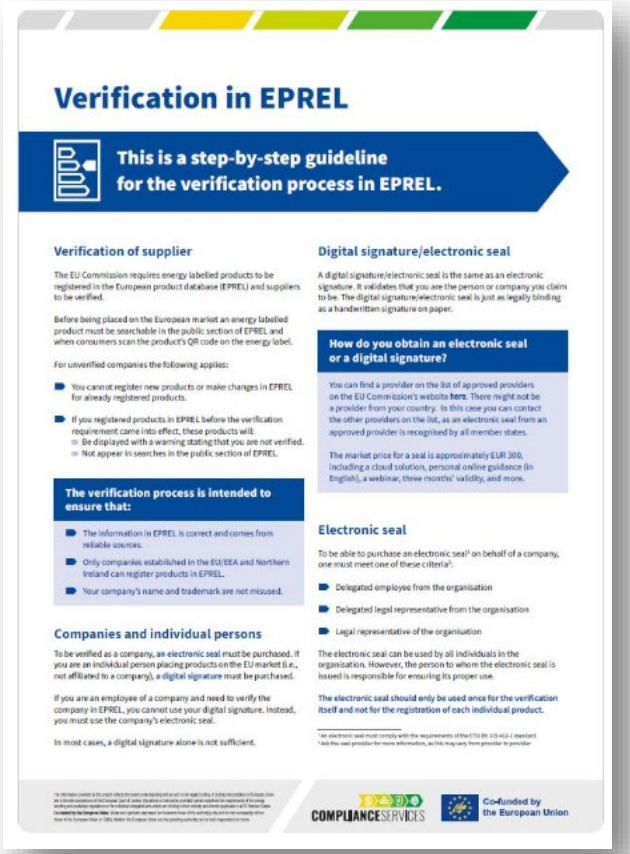
Important

- The supplier must pass a verification process first before being able to register products in EPREL.

Suppliers need to pass a verification process to ensure:

- The information in EPREL comes from reliable sources.
- Only suppliers established in the EU/EEA can register products in EPREL.
- The supplier's name and trademark are not misused.

Since 22nd of October, models from unverified suppliers are no longer visible in the public part of EPREL.



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Market surveillance

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How to prepare for market surveillance

Note: EU-level legislation, but Member-State-level surveillance.

Suppliers and retailers have the responsibility:

- To ensure accuracy of figures on the energy label and in the documentation
- To show the energy labels in the prescribed format and location
- To make sure the product information sheet is available.

Your national market surveillance authority (MSA) verifies:

- Whether products, suppliers and retailers on the EU market comply (among others) with the energy labelling and ecodesign requirements.

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Enforcement

MSAs have several methods for market surveillance activities…

- Physical inspections: Product testing, shops, etc.
- Document inspections: Technical documentation, advertisements, etc.
- Online inspections: Web-shops, etc.
- Inspections at the borders, documents, package design, etc.

… and for enforcement (towards suppliers or dealers):

- Demand additional or missing information (energy label, arrow, product information sheet) or its correction
- Apply fines if information is not correct or missing
- Remove products from the EU market (E.g. in case of severely wrong declarations on the label with no supplier remedy action)

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About the project

Compliance Services

At your disposal to help you properly implement the ecodesign and energy labelling legislation

Services for suppliers

If you produce or import a product for the EU market, you have to ensure that the product and the related documentation as well as information and promotion materials comply with the requirements specified in the product–specific ecodesign and energy labelling regulations.

coordinated by

AUSTRIAN ENERGY AGENCY

European organisations

ASSOCIATION OF THE EUROPEAN HEATING INDUSTRY

EUROPEAN HEAT PUMP ASSOCIATION

SOLAR HEAT EUROPE/ EUROPEAN SOLAR THERMAL INDUSTRY

EPIA SOLARPOWER EUROPE

ENVIRONMENTAL COALITION ON STAND.

National organisations

ADEME
Agence de l'environnement et de lamaitrise de l'energie
France

ADENE
Agencia para a energia
Portugal

ALTROCONSUMO
EDIZIONI srl
Italy

APED
Associação Portuguesa de Empresas de Distribuição
Portugal

ENERGISTYRELSEN
Danish Energy Agency
Denmark

SEVEn
The Energy Efficiency Center z.u.
Czechia

VORES BUREAU
Denmark

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COMPLIANCE SERVICES project

Product categories covered so far:

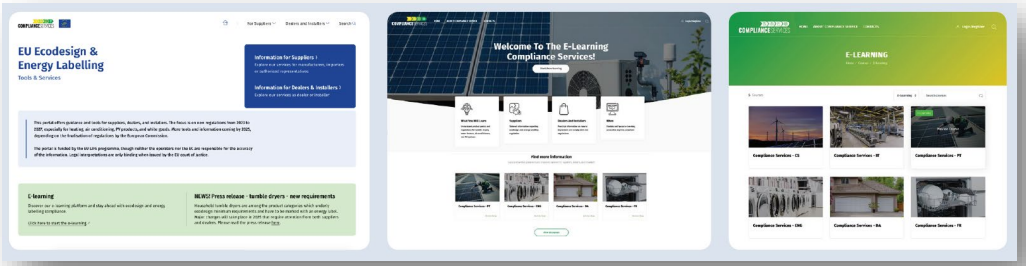
- Local space heaters (only ecodesign)
- Smartphones, slate tablets, other mobile phones and cordless phones
- Tumble dryers

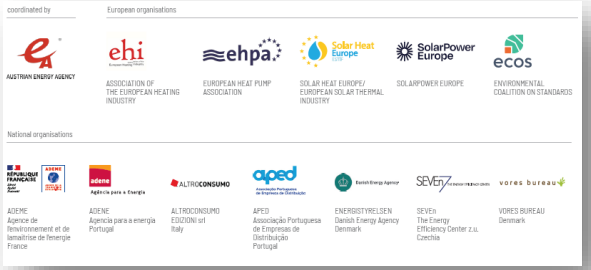
Horizontal topics

- Relevant for all product groups, for example, the definition of “Placing on the market”, etc.

In the pipeline (once the new regulations are published):

- Heating products
- Water heating products
- Air-conditioning products
- PV and solar panels





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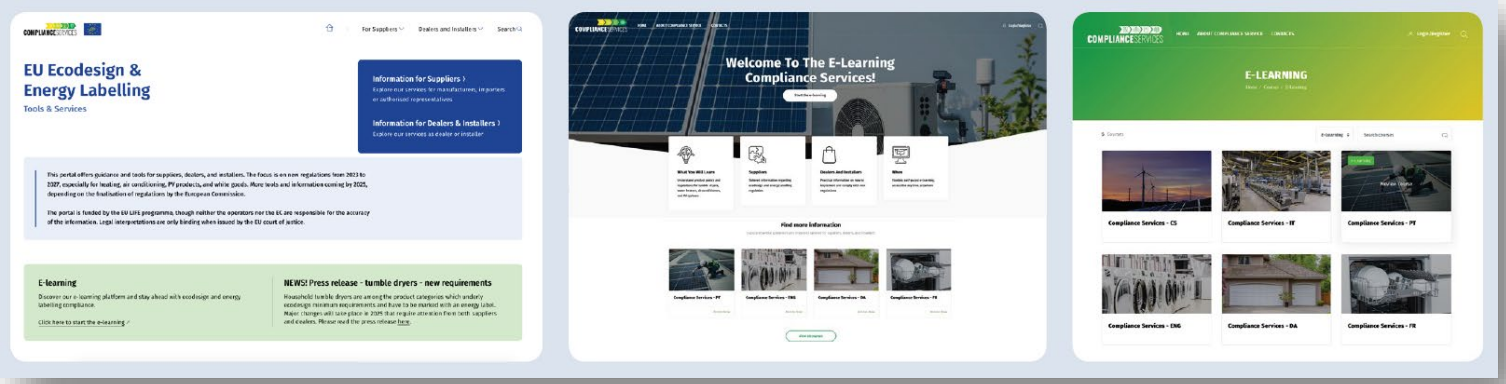
About the project / how we can help you

www.product-compliance-services.eu

Visit our project webpage:

- Guidelines (horizontal/product-specific)
- Webinars
- Helpdesk service, FAQs
- E-learning (product policy, tumble dryers, smartphones and tablets, and more)

- Sections in: English and Czech, Danish, French, German, Italian, Portuguese



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Ecodesign supplier guideline – Local Space Heaters

NEW:

👉 Comparison of the old and the new ecodesign regulation

👉 Overview of product information requirements

👉 List of spare parts to be available

👉 Access to repair and maintenance information

👉 Examples of common mistakes observed by market surveillance, etc.

Available for download here:
https://www.product-compliance-services.eu/suppliers/product-specific-guidelines/single-room-heaters/local-space-heaters/quick-guide-local-space-heaters-to-be-downloaded-or-printed

Ecodesign
Supplier guideline

Local Space Heaters

Local space heaters (LSH) are subject to ecodesign and energy labelling requirements. The ecodesign regulation was revised in 2024, introducing new provisions that apply from the 1st of July 2025, except for the rules on circumvention, which have been applicable since the 9th of May 2024.

Ecodesign

The ecodesign regulation sets minimum requirements for e.g. energy efficiency, resource efficiency concerning spare parts and for information requirements. Non-compliant products must not be placed on the EU market.

This guideline offers an overview of the updated ecodesign regulation and presents a comparison between the requirements of the old and the new regulations for local space heaters (in this guideline named "LSH"). The complete set of requirements is described in the regulations:
- The old ecodesign regulation (EU) 2015/1188.
- The new ecodesign regulation (EU) 2024/1103.

Comparison in brief

The new regulation includes, among other the following changes compared with the old regulation:
- A broader scope,
- Changed minimum requirements,
- A lower conversion coefficient (CC) for electricity,
- New calculation methods,
- New information requirements,
- Low power modes requirements,
- New emission requirements for nitrogen oxides,
- Requirements for control accuracy and control to setpoint deviation,
- Requirements aimed at protecting consumers (circumvention and software updates),
- Requirements ensuring better reparability of products (e.g. spare parts) and recyclability.

Please note that the energy labelling regulation (EU) 2015/1189 is still in place without an end date. There are no changes to these requirements.

Scope of the old and the new regulation

In both regulations, only heaters using electricity, or gaseous or liquid fuels are included. Biomass LSH are covered by the ecodesign regulation EU 2015/1185.

The ecodesign regulation EU 2015/1188 lays down requirements for placing on the market and putting into service:
- Domestic local heaters with a nominal heat output of 50 kW or less and
- Commercial LSH with a nominal heat output of the product or of a single segment heat output of 120 kW or less.

Increased scope in the new ecodesign regulation (EU) 2024/1103

The scope of the new regulation is broader than that of regulation (EU) 2015/1188:
- The **maximum nominal heat output** of the product or a single tube segment heat output for commercial LSH has been increased to **300 kW**.
- Only cooking appliances have been exempted from the scope.
- LSH placed on the market without control are now included in the scope and Requirements for separate-related controls have been introduced.
- Slave heaters are now in scope.

Both the old and new regulation apply to:
- **Domestic heaters**
  - Open fronted LSH and open to chimney LSH,
  - Closed fronted open combustion LSH,
  - Balanced flue LSH,
  - Electric LSH (fixed and portable),
  - Electric storage LSH,
  - Electric underfloor LSH,
  - Electric visibly glowing radiant LSH (fixed and portable),
  - Towel rails.[1]
- **Commercial LSH**
  - Luminous LSH,
  - Tube LSH.

1 Definitions and ranges only part of (EU) 2024/1103. However, towel rails were also covered by (EU) 2015/1188 where they were considered as electric fixed LSH.

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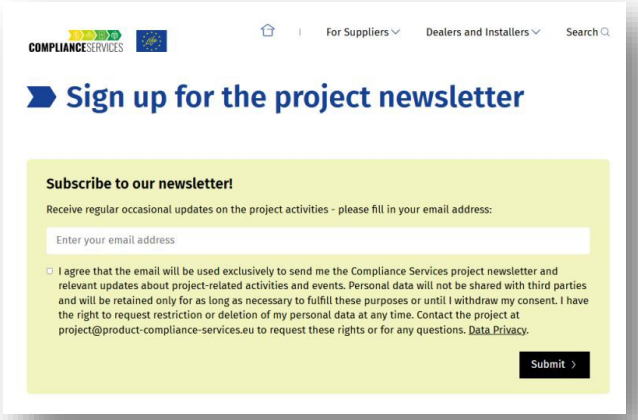
Compliance Services newsletter

Please sign up to the project newsletter to obtain future project materials and guidelines, webinar invitations, updates on new energy labelling and ecodesign legislation:



Newsletter:

https://www.product-compliance-services.eu/sign-up-for-the-project-newsletter

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Links, updates and contacts

Compliance Services website
www.product-compliance-services.eu

Email
project@product-compliance-services.eu

ServiceDesk
https://www.product-compliance-services.eu/compliance-service-desk-steps

LinkedIn
https://www.linkedin.com/company/product-compliance-services

Newsletter
https://www.product-compliance-services.eu/sign-up-for-the-compliance-services-newsletter

E-learning
https://elearningcomplianceservices.adene.pt/

EC portal:
https://energy-efficient-products.ec.europa.eu/product-list/local-space-heaters_en

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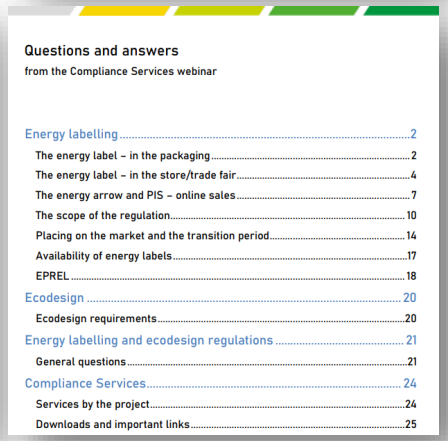
We will share with you per email:

- Webinar presentation
- Guidelines to suppliers
- Answers to specific questions



Compliance Services project is funded by the LIFE programme under contract n. 101120843.

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Questions and Answers

Local Space Heaters
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Question 1

- How to classify portable local space heater like fan heater in this regulation of 2024?

They are electric portable LSH.

Plese note that fan heaters were unintentionally excluded from the Regulation because air heating systems are excluded. Amendment process is undergoing to include it again.

Question 2

- A question on spare part availability - are small modular subassemblies acceptable as replacement parts?

Spare parts do not have to be delivered as one piece as long as the spare part availability and repairability is not negatively affected.

Questions and answers – will be provided

Note:

- For some questions received we asked for a clarification.
- All questions received will be answered in a Q&A document and circulated by email.

Please feel free to send any further questions by:

- e-mail project@product-compliance-services.eu or
- use the ServiceDesk https://www.product-compliance-services.eu/compliance-service-desk-steps

Local Space Heaters

COMPLIANCESERVICES
Co-funded by the European Union

The Compliance Services project is coordinated by the Austrian Energy Agency.

COMPLIANCESERVICES

Compliance Services project is funded by the LIFE programme under contract n. 101120843.

Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or CINEA. Neither the European Union nor the granting authority can be held responsible for them.

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