



UK Government

Updating standards for local space heating products

A consultation on new proposed requirements for local space heating products.

Closing date: 20 May 2026, 23:55 GMT



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Any enquiries regarding this publication should be sent to us at: localspaceheaters@energysecurity.gov.uk

Executive Summary

Introduction

Ecodesign regulations enable the Government to set minimum energy performance standards (MEPS) to remove poorly performing products from the market - ensuring consumers benefit from lower energy costs by running efficient products and incentivising manufacturers to produce higher-efficiency products.

Ecodesign policies have contributed significantly to our energy security, reducing yearly electricity demand by an estimated 24.5 TWh over the last decade, comparable to the 25 TWh output of Sizewell C nuclear power plant. They have delivered 59 MtCO₂e carbon savings since 2010 and are a highly cost-effective way to reduce emissions and bills and achieve our net zero goals in a way that benefits consumers and businesses.

This consultation concerns the current ecodesign regulations for electrically powered, gas and, liquid fuelled local space heater products, 2015/1188. We are proposing to repeal these regulations and replace them with a new statutory instrument, a proposed draft version of which is attached. We estimate that adopting these measures across Great Britain (GB) will facilitate energy demand reduction of around 6 TWh (4 TWh in electricity and 2 TWh in gas) by 2050. This option would constitute a social-Net Present Value (NPV) of £470m to 2050. This figure will vary by the fuel type and method of operation of each product.

The main proposals in this consultation are:

1. Increasing scope and minimum product efficiency standards
2. Requirement for product controls, for products to provide heat
3. Circular economy and repair measures to increase product lifespan

The new proposed ecodesign requirements detailed in this document would align GB with the European Union (EU) and Northern Ireland (NI), providing equivalent standards to those set out in Regulation (EU) 2024/1103. We believe an aligned regulatory environment will reduce the compliance burden for manufacturers, improving product access for consumers. Related policies, on ecodesign for solid fuel local space heating products and regulations on labelling are not in the scope of this consultation and will be consulted on separately in due course.

We are considering combining ecodesign regulations for World Trade Organisation (WTO) notification purposes. We will submit a formal notification in due course, accompanying later regulations in this package.

Proposals

We are seeking feedback on our proposals to improve local space heating product standards through updated ecodesign legislation. In doing so we are seeking to avoid unnecessary barriers within the United Kingdom's internal market and trade between GB, NI, and key trading partners, including the EU. As such, the proposals set out in this consultation seek consistency with EU ecodesign regulations, which have applied since 1 July 2025. This would facilitate smoother trade relations, reduce administrative burdens for manufacturers, and ensure that consumers have access to more efficient products. We also propose enhancing the efficiency of new products, to ensure that energy is consumed effectively, and to promote circular economy aspects such as right to repair.

The policies we are proposing in this consultation are grouped into three sections. The first section concerns the performance of local space heating products: scope, performance evaluation and performance requirements of products. The second section concerns controlling the power output of products, through the use of controls on providing heat. The final section contains policies on right-to-repair, consumer information, and protection.

Enhancing efficiency of products (Part 1)

As the local space heating market innovates, regulation is an effective tool to remove outdated technology from the market. This can be achieved in two ways: broadening products' regulatory scope and increasing performance requirements. The proposals outlined in this consultation address these two points as follows:

Broadening scope

- Inclusion of externally driven supplementary heating units (also referred to commercially as slave heaters) in ecodesign requirements
- Requirement for a form of control (including 'related' controls for externally driven supplementary heating units) on a local space heating product to allow heat output.
- Increasing minimum performance standards to reflect technological advances.
- Separation of 'towel rails' from the 'fixed electric' product group.
- Reduction of the Primary Energy Factor Conversion Coefficient (CC) to 1.9.
- Changes of definitions of categories
- Changes to methodology of calculating MEPS
- Reduction of maximum nitrogen oxide emission limits

Encouraging effective energy consumption (Part 2)

Alongside minimum efficiencies outlined (Part 1) for each of the 15 product categories, we are proposing measures to ensure energy is consumed effectively. One principal method of driving this is using controls applied to local space heating devices. To ensure that the efficiency of controls is accurately accounted for, we are proposing to implement the following changes:

- Additional definition of a 'related control' by operability.
- Requirements for use of a form of control to provide heat
- Requirement for each product to have an idle, low-power or off mode.

Supporting a circular economy (Part 3)

The final aspect of our proposals relate to new requirements regarding product documentation. This includes the ability to be approved as a professional repairer and ensuring the ability to access spare parts and repair information. These measures will empower consumers to repair their appliances, extending their useful life and reducing the need to produce new products unnecessarily. The new requirements include:

- Process for approved installer status.
- Access to repair information.
- Providing certain spare parts.
- Changes to required document and phrasing.
- A specific ban on circumvention and use of defeat devices.

Consultation Impact

We welcome your feedback on the proposals in this consultation document, the accompanying draft statutory instrument (SI) and options assessment. We will aim to publish a Government Response shortly after the closing date for responses to this consultation has passed, and after the feedback received has been considered.

A glossary of terms can be found in Annex A. The full list of the questions asked in this consultation is included in Annex B.

Contents

Executive Summary	3
Introduction	3
Proposals.....	4
Consultation Impact.....	5
General Information.....	8
Why we are consulting.....	8
Consultation details	8
How to Respond	9
Confidentiality and data protection.....	9
Quality assurance	10
Product coverage and extent of regulation	11
Part 1: Enhancing efficiency of products	13
Chapter 1: Product scope and categorisation.....	14
Introduction	14
Product category definitions.....	14
Power consumption.....	18
Speciality and multi-function products.....	19
Chapter 2: Calculating efficiency of products.....	19
Introduction	19
Efficiency calculation methodology	20
Testing methods.....	20
Primary energy factor.....	21
Chapter 3: Minimum performance thresholds.....	22
Introduction	22
Product efficiency thresholds	23
Nitrogen oxide emission limits.....	27
Part 2: Encouraging effective energy consumption	28
Chapter 4: Regulating delivery of heat.....	28
Introduction	28
Definition of a control	28
Minimum requirements on heat control	29
Power consumption whilst not in active use	30

Part 3: Supporting a Circular economy.....	32
Chapter 5: Right to repair	32
Introduction	32
Spare part availability.....	32
Access to information on repair for installers	33
Chapter 6: Consumer protection.....	34
Introduction	34
Circumvention	34
Documentation and mandatory phrasing	35
Review	36
Alignment with the EU regulation	37
Equality Act 2010	38
Annex A: Glossary.....	39
Annex B: List of Consultation questions	41
Annex C: Parameters used for SSHE calculation	48
Annex D: Proposed formula changes.....	50
Annex E: Spare part requirements	52
Annex F: Transitional methods.....	55
Annex G: Bibliography.....	65

General Information

Why we are consulting

Improving product standards can save consumers money by reducing their bills, whilst cutting carbon emissions and increasing energy security. Product regulations, such as those set out in ecodesign are an effective lever to help reduce greenhouse gas emissions to net zero by 2050.

We welcome views and evidence on the proposals set out in this consultation document, draft SI, and options assessment.

Consultation details

Issued: 25 March 2026

Respond by: 20 May 2026 23:55

Enquiries to:

*Energy-Related Products Team
Department for Energy Security and Net Zero
3-8 Whitehall Place
London
SW1A 2EG*

Email: localspaceheaters@energysecurity.gov.uk

Consultation reference: Raising standards for local space heating products.

Audiences: Manufacturers and/or their authorised representatives, retailers, importers, trade bodies, consumer groups, environmental organisations and other civil society organisations or individuals with an interest in local space heating products.

Territorial extent: The proposed updates to ecodesign regulations set out in this consultation would apply to Great Britain. To facilitate dual access to both the UK Internal Market and the EU Single Market, Northern Ireland continues to apply EU ecodesign and energy labelling regulations in accordance with the Windsor Framework. As the UK Government is looking to align standards in GB with those of the EU, goods compliant with these aligned standards will also be able to be placed on the market in Northern Ireland. At the same time, Northern Ireland businesses will continue to have unfettered access to the GB market. The proposals set out in this consultation facilitate smooth trade between Great Britain and Northern Ireland.

How to Respond

Respond online at: <https://energygovuk.citizenspace.com/heat/ecodesign-regulations-local-space-heating-products>

We strongly encourage responses via the online survey. Using the online survey greatly assists our analysis of the responses, enabling more efficient and effective consideration of the issues raised. If it is not possible for you to use the online survey, you can respond through email or a written response.

Email: localspaceheaters@energysecurity.gov.uk

Write to:

Energy-Related Products Team
Department for Energy Security and Net Zero
3-8 Whitehall Place
London
SW1A 2EG

When responding, please state whether you are responding **as an individual** or representing the **views of an organisation**. Your response will be most useful if it is framed in direct response to the questions posed, though further comments and evidence are also welcome.

Confidentiality and data protection

Information you provide in response to this consultation, including personal information, may be disclosed in accordance with UK legislation (the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004).

Please notify us if you wish for your information to remain confidential, noting that we cannot guarantee confidentiality in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not be regarded by us as a confidentiality request.

We will process your personal data in accordance with all applicable data protection laws. See our [privacy policy](#).

We will summarise all responses and publish this summary on [GOV.UK](#). The summary will include a list of names or organisations that responded, but not people's personal names, addresses or other contact details.

Quality assurance

This consultation is being carried out in accordance with the government's consultation principles.

If you have any complaints about the way this consultation has been conducted, please email: bru@energysecurity.gov.uk.

Product coverage and extent of regulation

Local space heating relates to a broad category of products designed and marketed to provide thermal comfort to people. Typical products in scope of these regulations are electric radiators, storage heaters, and open fronted gas fires. Representative categories in scope of these proposals, sourced from the Gov.uk website are described using the WTO commodity codes in Table 1.¹ This consultation does not address energy labelling, which is regulated separately for these product categories, currently by 2015/1186.

Furthermore, ecodesign measures for local space heating products which use a solid fuel are **not in the scope** of this regulation, with ecodesign requirements regulated by Commission Regulation (EU) 2015/1185.² We will consult in due course on updated measures relating to this product type, and energy labelling.

Table 1: List of commodity codes and their definitions, covering products in scope for the ecodesign proposals outlined in this consultation.

Code	Descriptor
732181	Stoves, heaters, grates, fires, wash boilers, braziers and similar appliances, of iron or steel, for gas fuel or for both gas and other fuels (excl. cooking appliances, whether or not with oven, separate ovens, plate warmers, central heating boilers).
732182	Stoves, heaters, grates, fires, wash boilers, braziers and similar appliances, of iron or steel, for liquid fuel (excl. cooking appliances, whether or not with oven, separate ovens, plate warmers, central heating boilers, geysers, hot water cylinders).
732189	Stoves, heaters, grates, fires, wash boilers, braziers and similar domestic appliances, of iron or steel, for solid fuel or other non-electric source of energy (excl. liquid or gaseous fuel, and cooking appliances, whether or not with oven, separate ovens, plate warmers, central heating boilers, hot water cylinders and large cooking appliances).
732190	Parts of domestic appliances non-electrically heated of heading 7321, n.e.s.

¹ [Trade Tariff: look up commodity codes, duty and VAT rates - GOV.UK](#)

² [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 \(Text with EEA relevance\)](#)

732290	Air heaters and hot-air distributors, incl. distributors which can also distribute fresh or conditioned air, non-electrically heated, incorporating a motor-driven fan or blower, and parts thereof, of iron or steel.
841911	Instantaneous gas water heaters (excl. boilers or water heaters for central heating)
841919	Instantaneous or storage water heaters, non-electric (excl. instantaneous gas water heaters, solar water heaters and boilers or water heaters for central heating)
851610	Electric instantaneous or storage water heaters and immersion heaters
851621	Electric storage heating radiators, for space-heating
851629	Electric space-heating and soil-heating apparatus (excl. storage heating radiators)

Part 1: Enhancing efficiency of products

Technological advances which have occurred since the last regulation (2015/1188)³ have led to a series of advanced heating controls, separately marketed and sold, entering the market. To ensure regulation remains relevant, the scope of ecodesign regulations should reflect these changes in usage. Proposed policy changes to scope and performance are outlined in this chapter, with those relating specifically to the use of controls outlined in Part 2.

Reflecting the change in technology mix across the local space heating product category, we are proposing changes to the methodology of calculating seasonal space heating efficiency. This would ensure that the relative energy consumption of products using gas, liquid, or electricity as the main power source are accurately reflected in primary terms. As outlined in this chapter, the proposed efficiency-based changes include:

- An increase in scope to include ‘externally driven supplementary heating units, which have previously not been considered in scope of ecodesign regulation.
- Changes to other product classifications for ecodesign evaluation purposes, separating significantly different technologies, i.e. towel rails, which were previously considered ‘fixed electric’ local space heaters.
- A reduction of maximum allowed nitrogen oxide emission limits to reflect an increase in efficiency of the market.
- Changes to the methodology used to calculate Seasonal space heating efficiency
- Reduction of the Primary Energy Conversion Coefficient (CC) from 2.5 to 1.9, to better reflect the efficiency of electric heat generation, relative to fossil fuel use.

³ Current GB ecodesign legislation for local space heaters (2015/1188), ‘Commission Regulation (EU) 2015/1188’, available at: <https://www.legislation.gov.uk/eur/2015/1188>

Chapter 1: Product scope and categorisation

Introduction

This consultation contains a diverse range of products and technology types, aimed at providing indoor thermal comfort. Ensuring that the category definitions accurately represent the technologies within this product space is therefore crucial. In this chapter, changes relative to the existing GB regulation, 2015/1188, are proposed. Given the difference in technology and fuel consumption, we believe that 15 product categories best balances the broad range of technology types in scope for this regulation, whilst allowing ecodesign thresholds which accurately represent the technology available.

In existing GB regulation 2015/1188, there are 12 product categories. There is ambiguity over the inclusion of products such as towel rails, which has led to some products being considered out of scope, despite evidence that consumers may benefit from ecodesign regulation applying.

To better reflect the technology in the market, we are proposing changes to the scope and definitions of product categories used to set minimum energy performance standards. This will enable the use of appropriate minimum standards for each technology type. The changes to scope are broken down in this section, per product type.

Product category definitions

This consultation proposes definitions of 15 categories of local space heating products, with minimum energy performance standards set relative to the technical capabilities of products within that category. Draft SI Schedule 1 outlines the product definitions in full. Changes made to product categories are outlined in Table 2.

Table 2 : Proposed changes to the product category definition of Local Space Heating products, relative to existing GB regulation.

Product type	Difference between existing regulation and proposed new definition
Open fronted local space heaters and open to chimney local space heaters	No change to definition
Closed fronted open combustion local space heaters	No change to definition
Balanced flue local space heaters	New product category
Electric portable local space heaters	Minor scope change
Electric fixed local space heaters > 250 W	Towel rails removed from category

Electric fixed local space heaters ≤ 250 W	Towel rails removed from category
Electric storage local space heaters	No change to definition
Electric underfloor local space heaters	Minor scope change
Fixed electric visibly glowing radiant local space heaters > 1.2 kW	No change to definition
Fixed electric visibly glowing radiant local space heaters ≤ 1.2 kW	No change to definition
Electric visibly glowing radiant portable local space heaters	New product category
[electric] towel rails > 250 W	Separated from fixed electric
[electric] towel rails > 60 w and ≤ 250 W	Separated from fixed electric
Luminous local space heaters	No change to definition
Tube local space heaters	No change to definition

Product categories without change

Relative to the existing definitions per 2015/1188, we are not proposing changes to the definitions of the following product categories:

- Closed fronted open combustion
- Electric local space heater
- Electric visibly glowing radiant local space heater
- Electric storage local space heaters
- Luminous local space heaters
- Open fronted local space heaters
- Tube local space heaters

- 1. Do you believe that the product category definitions outlined above should be modified from their current state? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Heaters incapable of operation without control

A domestic 'externally driven supplementary heating unit' is defined as a heater not capable of operating without a form of control. Having previously been considered out of scope in the previous 2015/1188 regulation, we believe that there is sufficient market or consumer demand for inclusion. This would ensure that consumers can benefit from ecodesign measures, whilst having access to the diverse range of

'related' controls which are marketed and sold separately from local space heating products.

- 2. Do you have views on the proposed change to include 'externally driven supplementary heating units' in the scope of ecodesign regulations? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Alongside the energy demand reduction achieved through more efficient products, we are proposing a requirement for heat output to be controlled for Local Space Heating products.

- 3. Do you have a view on whether the requirement for a form of control, such as a timer, on a local space heating product represents a benefit to consumers? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Balanced flue

Balanced flue local space heaters use gas or liquid fuel and operate with a partitioned flue system that both supplies combustion air and expels exhaust gases externally. This differs from open combustion, as the products of combustion are sealed from the space to be heated. Previously in scope as part of the 'closed combustion' product definition, we have proposed in the draft SI that they have their own category, given their increasing market share.

- 4. Do you agree to include a definition of balanced flue local space heating product category as set out in the attached draft SI, Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Electric portable

Previously, portable heaters were defined by excluding several types: storage, underfloor, radiant, visibly glowing, and externally driven supplementary heating units. Additional products which were covered under the scope, had ecodesign requirements incorporated into the categories of their fixed equivalents. The new proposed definition shifts to a positive description, requiring the heater to have a cord and plug, be movable between rooms, and not need fixing to a location. It also narrows exclusions to only visibly glowing radiant portable heaters.

- 5. Do you agree to include a definition of electric portable local space heating product category as set out in the attached draft SI, Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Electric fixed

We are proposing to amend the definition of electric fixed local space heater to account for the product categories which now have separate ecodesign requirements. To account for this, towel rails, portable electric local space heaters, and electric underfloor local space heating products are now specifically excluded from the definition in this category, with their own category and performance requirements established.

- 6. Do you agree to include a definition of electric fixed local space heating as set out in the attached draft SI, Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Electric underfloor

For avoidance of ambiguity, we are proposing that the phrasing “including self-regulating cables and mats” be added to the existing definition of electric underfloor local space heating products.

- 7. Do you have any views on the proposed change to the definition of Electric underfloor local space heating products as set out in attached draft SI Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Electric visibly glowing radiant portable

Whilst the definition of electric visibly glowing radiant local space heaters is retained, a new category, accounting for their portable equivalent has been made.

- 8. Do you agree to include a definition of electric visibly glowing radiant portable local space heating products as set out in the attached draft SI, Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Towel rails

To avoid misinterpretation, we propose that towel rails are newly defined and separated from the category ‘fixed local space heater’ in existing regulation. Further,

we propose that towel rails are split by category by power consumption: < 60 W, 60 W < x ≤ 250 W, and >250 W.

9. Do you have views on the proposal to separate ecodesign performance of towel rails from fixed electric local space heaters? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

10. Do you have views on the proposal to categorise ecodesign performance of towel rails as equal to or below 60 W, above 60, and equal to or below 250 W, and above 250 W as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

Power consumption

Applying to all products, we are proposing to increase the range of power consumption which the ecodesign regulations apply. The power limits of products which would be in scope, should the proposals be adopted are as follows:

Domestic local space heaters, 0 - 50 kW

- Open fronted local space heaters and open to chimney local space heaters
- Closed fronted open combustion local space heaters
- Balanced flue local space heaters
- Electric portable local space heaters
- Electric fixed local space heaters >250W
- Electric fixed local space heaters ≤ 250W
- Electric storage local space heaters
- Electric underfloor local space heaters
- Fixed electric visibly glowing radiant local space heaters >1.2kW
- Fixed electric visibly glowing radiant local space heaters ≤ 1.2kW
- Electric visibly glowing radiant portable local space heaters
- Towel rails >250W
- Towel rails >60W And ≤ 250W

11. Do you have views on the proposed increased scope set at 50 kW or lower for domestic local space heating products as set out in paragraph 3a of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

Commercial local space heaters, 0 - 300 kW

- Luminous local space heaters
- Tube local space heaters (single tube power consumption)

12. Do you have views on the proposed increased scope set at 300 kW or lower for commercial local space heating products as set out in paragraph 3b of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

13. Do you feel the product categories proposed in this consultation accurately reflect the distribution of products sold on the GB market? How do you view this changing in the next 5 to 10 years? Please provide evidence or reasoning to support your answer.

Speciality and multi-function products

We are proposing 15 product categories for the purpose of ecodesign evaluation, with the intention of each product within scope of this regulation fitting a single category. To avoid unintended consequences for products with multiple purposes, we have also provided exclusion criteria for such multi-functional products. We expect that cooking products, and those with outside applications in particular should be considered out of scope of this regulation.

Given the breadth of scope of this proposed regulation, we welcome the views of those who have identified any potential issues in complying with the ecodesign requirements proposed in this consultation, resulting from multi-functional applications or accidental inclusion in scope.

14. Do you believe that the proposed regulatory changes, as set out in the attached draft SI, could restrict/affect the ability of manufacturers to bring multi-functional products to market? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

Chapter 2: Calculating efficiency of products

Introduction

One measure of efficiency of a heat generating product such as those in the scope of this regulation is Seasonal Space Heating Efficiency (SSHE). This measure produces a single value drawn from a series of parameters relating to a local space heater, including heat output, energy consumption, and control functionality.

The current GB methodology used to calculate SSHE, in regulation 2015/1188 differs from current EU methodology, which we are proposing to align with. One factor driving a change to SSHE methodology is the need to reduce the Primary Energy Factor Conversion Coefficient, (CC). Under the methodology outlined in

2015/1188, we assess that a reduction of this value would unbalance the efficiency measures between fuel types, leading to misleading efficiency comparisons between products.

Efficiency calculation methodology

We are proposing for the methodology used to calculate SSHE to be updated, to accurately reflect the efficiency of products and their related controls and additionally provide a more effective balance between products of differing fuel types.

Parameters currently used in the calculation of SSHE are set out in Annex C, with proposed formula changes in Annex D.

15. Do you have a view on the testing methodologies currently used to calculate parameters used in seasonal space heating efficiency calculations? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

16. What innovation do you envisage in the local space heating product area will be driven by this proposed regulatory change? Please provide evidence or reasoning to support your answer.

Testing methods

Many parameters used to calculate SSHE require experimental determination, which is carried out using British Standard (BS) or European Norms (EN) testing methods. There are three categories of standards used to determine methods for product testing:

Harmonised standard: A standard developed specifically to facilitate compliance with an EU regulation (e.g. an ecodesign regulation), published by one of the approved EU standardisation bodies. It is a detailed description of the testing and calculation methods required to comply with the regulation. Application of the standard to a product creates a presumption of conformity with the ecodesign or energy labelling requirements of the regulation that it relates to.

Designated standard: The GB version of harmonised standards. Any harmonised standard can be made into a designated standard⁴, and indeed most designated standards are also harmonised standards.

⁴ BSI (British Standards Institution) is a member of CEN and CENELEC, who are the European bodies that develop harmonised standards. BSI is required to adopt any CEN/CENELEC standard as

Transitional method: If harmonised standards are not available when a regulation is adopted by the EU, transitional methods are published, which set out the testing and calculation methods to be used until harmonised standard are available. Transitional methods are either an exhaustive description of the method or refer to existing standards developed for other purposes.⁵

We are proposing to allow the use of transitional methods (annex F),⁶ which will be replaced by designated standards once the harmonised standard is published and adopted by the EU in due course.

17. Do you have any views on the proposal to include designated standards? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

18. Do you have any views on the validity and current day relevance of the 'transitional' testing methods, hosted on the designated standards website? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

Primary energy factor

Primary energy is energy that has not undergone any conversion or transformation process, for example oil or gas. Secondary energy is generated by converting or transforming this primary energy, for example electricity generated by burning fossil fuels. The primary energy factor describes the efficiency of converting energy from primary sources (e.g. renewables such as wind, solar hydropower or fossil fuels such as coal or crude oil) to a secondary energy carrier (e.g. electricity, natural gas) that provides energy services delivered to end-users, equation 1.

$$\text{Primary Energy Factor Conversion Coefficient (CC)} = 1 + \sum_{\text{All Processes}} \left(\frac{\text{Energy use}}{\text{Energy content of fuel}} \right) \quad (1)$$

Less energy is lost when converting from renewables to electricity, than from burning fossil fuels to generate electricity. Therefore, as the electricity grid decarbonises, we

a UK national standard so any harmonised standard will have an equivalent UK national standard and can therefore be made into a designated standard. [Standardisation - GOV.UK](#)

⁵ There are many standards that are not harmonised standards but are developed by European/international standardisation bodies for other purposes. These are often used as a basis for transitional methods, usually with some modification or additional steps to make them relevant to that specific ecodesign regulation.

⁶ [Designated standards - GOV.UK](#)

can expect the primary energy factor for electricity to reduce. The Home Energy Model for the Future Homes Standard consultation proposed a primary energy factor for electricity of 1.969⁷ for England and Wales. The government response to this consultation is expected in due course. However, the proposed figure is similar to the updated figure proposed by the European Commission in 2023. In 2023, the European Commission updated the primary energy factor in the Energy Efficiency Directive to a CC of 1.910, to better reflect the energy mix of electricity in the EU.

Lowering the Primary Energy Factor conversion coefficient

To better reflect the energy mix across the UK, we are proposing to reduce the CC to 1.9, from the current 2015/1188 value of 2.5. We feel that this change is necessary to ensure that the increased efficiency of using electrically powered local space heating products (owing to the greater fraction of renewable electricity generation sources compared to 2015) is accurately reflected. Whilst the proposed new value of 1.9 is slightly below the 1.969 reported for the UK in 2023, the current clean energy transition is expected to reduce the value further through the duration of this proposed SI. In matching the EU, we anticipate that ecodesign standards' calculations will be simplified, supporting the internal market.

19. Do you agree with lowering the Primary Energy Factor for electricity to 1.9 as set out in draft SI schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

Chapter 3: Minimum performance thresholds

Introduction

The proposed changes to MEPS are set out as minimum SSHE thresholds for each of the 15 product categories defined in Chapter 1, alongside four additional ecodesign requirements.

Given the need to rebalance the formula used to calculate SSHE, the thresholds required for each product must also be altered. The differences between calculations mean that direct comparison between numerical values of the existing 2015/1188 regulations and differences in magnitude of SSHE threshold do not necessarily indicate a change in MEPS threshold. From an efficiency requirement perspective, thresholds proposed in the SI are kept broadly similar to existing levels, with less than 36% of products expected to be excluded on efficiency grounds compared to 2015 standards thresholds. Most of the estimated 6,119 GWh energy savings are

⁷ DESNZ (2023), 'Home Energy Model: Future Homes Standard assessment', Table 8, [Home Energy Model: Future Homes Standard assessment - GOV.UK](#)

associated with the increase in scope, meaning local space heating products which previously had no ecodesign regulations would be required to meet these proposals.

Product efficiency thresholds

We propose that the seasonal space heating energy efficiency of open fronted local space heaters and open to chimney local space heaters must not be less than 40.3%.

20. Do you agree with the proposed threshold for open fronted and open to chimney local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of closed fronted open combustion local space heaters must not be less than 63.6%.

21. Do you agree with the proposed threshold for closed fronted open combustion local space heating products as set out in SI Draft Schedule 1 Part 2 ? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of balanced flue local space heaters must not be less than 63.6%.

22. Do you agree with the proposed threshold for balanced flue local space heating products as set out in SI Draft Schedule 1 Part 2 ? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of electric portable local space heaters must not be less than 44.7%.

23. Do you agree with the proposed threshold for electric portable local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose the seasonal space heating energy efficiency of electric fixed local space heaters with a nominal heat output above 250 W, except towel rails, must not be less than 47.5%.

24. Do you agree with the proposed threshold for electric fixed local space heating products of nominal output above 250 W as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of electric fixed local space heaters with a nominal heat output equal or below 250W, except towel rails, must not be less than 43.1%.

25. Do you agree with the proposed threshold for electric fixed local space heating products of nominal output equal to or below 250 W as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of electric storage local space heaters must not be less than 47.3%.

26. Do you agree with the proposed threshold for electric storage local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of electric underfloor local space heaters must not be less than 47.5%.

27. Do you agree with the proposed threshold for electric underfloor local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of electric visibly glowing radiant local space heaters with a nominal heat output above 1.2kW, except electric visibly glowing radiant portable local space heaters, must not be less than 46.8%.

28. Do you agree with the proposed threshold for electric visibly glowing radiant local space heaters with a nominal heat output above 1.2 kW, except electric visibly glowing radiant portable local space heaters local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of electric visibly glowing radiant local space heaters with a nominal heat output equal or below 1.2 kW, except electric visibly glowing radiant portable local space heaters, must not be less than 40.5%.

29. Do you agree with the proposed threshold for electric visibly glowing radiant local space heaters with a nominal heat output equal or below 1.2 kW, except electric visibly glowing radiant portable local space heaters local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of electric visibly glowing radiant portable local space heaters must not be less than 39.5%.

30. Do you agree with the proposed threshold for electric visibly glowing radiant portable local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of luminous local space heaters must not be less than 90.0%.

31. Do you agree with the proposed threshold for luminous local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of tube local space heaters must not be less than 80.0%.

32. Do you agree with the proposed threshold for tube local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of towel rails with a nominal heat output above 250 W must not be less than 46.0%.

33. Do you agree with the proposed threshold for towel rails with a nominal heat output above 250 W as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We propose that the seasonal space heating energy efficiency of towel rails with a nominal heat output above 60 W and equal or below 250 W must not be less than 42.1%.

34. Do you agree with the proposed threshold for towel rails with a nominal heat output above 60 W and equal or below 250 W as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

We are proposing that the thresholds for performance defined in this section will apply at the point at which the product is placed on the market.⁸ As a result, manufacturers will be required to demonstrate that a product is compliant at this point, rather than alternative points, such as the point when a product is 'put into service'.⁹

35. Do you have a view on whether the requirements should apply at the point of being 'placed on the market', or at point of 'coming into service'. Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

36. Aside from costs associated with complying with new minimum performance standards, do you expect there to be any additional costs associated with aligning GB regulatory standards with the EU?

⁸ In line with the relevant definitions at regulation 2 of <https://www.legislation.gov.uk/uksi/2010/2617/regulation/2>: a product is 'placed on the market' at the point when it is made available for the first time on the market of Great Britain, i.e. when it is first supplied for distribution or use on the British market in the course of a commercial activity, whether in return for payment or free of charge.

⁹ In line with the relevant definition at regulation 2 of [The Ecodesign for Energy-Related Products Regulations 2010](#): a product is 'put into service' when it is used for the first time for its intended purpose on the market of Great Britain, e.g. providing heating comfort to a person.

Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

Nitrogen oxide emission limits

Nitrogen oxide is a byproduct of combustion of gas and liquid fuels, associated with negative health outcomes in local areas. For product categories which produce nitrogen oxide, new thresholds are proposed in Table 3.

Table 3: Maximum nitrogen oxide emissions in milligrams per kilowatt hour energy input in existing GB regulations and proposed new emissions limits.

Local space heater type	Max nitrogen oxide emissions (mg/kWh _{input})	
	Previous threshold	Proposed threshold
Closed fronted open combustion	130	120
Open fronted	130	120
Balanced flue	130	120
Flueless	130	120
Open to Chimney	130	120
Luminous	200	180
Tube	200	180

37. Do you have views on the new proposed nitrogen oxide limits as set out in the SI draft Schedule 1 part 7? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

38. Do you foresee any technical feasibility issues with complying with the proposed nitrogen oxide emission limits? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

Part 2: Encouraging effective energy consumption

Improving product efficiency alone is not enough to deliver the full benefits of ecodesign regulation. Products must also operate in a way that avoids unnecessary energy use. This section sets out proposals to ensure local space heaters only provide heat when required, through appropriate controls and low-power modes. These measures complement the minimum efficiency requirements in Part 1 and aim to reduce wasted energy, lower bills, and cut emissions.

Product lifetimes for controls are significantly shorter than the lifetime of local space heating products, at 4-5 years, compared to 14 years for a local space heating product. In regulating the use of separately related controls, it is expected that controllers can be replaced by more functional and efficient ones, reducing the need for scrappage of older products with inefficient control.

The proposals in this section account for the change in use of controls, ensuring their use is appropriately regulated. Additional efficiency measures, aimed to avoid a local space heater running indefinitely can additionally contribute meaningful energy demand reduction.

Chapter 4: Regulating delivery of heat

Introduction

Existing regulations on local space heating products do not include requirements on the use of a related control, including ecodesign and minimum requirements. The proposals in this chapter outline their use, and minimum requirements required to enable output from a local space heater.

Products without a form of control have historically been excluded from the ecodesign regulation in GB, leading to a large number of products on the market not being subject to the regulations. This has allowed inefficient products to enter the market, requiring more energy to provide heating, and increasing household bills unnecessarily.

A second issue with the existing regulation is that technological developments of controls systems, including networked controllers are not accounted for. To maximise the benefits for consumers, we are proposing an approach for GB which is aligned with the EU and accurately reflects the efficiency benefits which a related control can provide.

Definition of a control

A 'control' in the context of this consultation is a device which regulates the ability of a local space heating product to provide heat to an area. We are proposing 17

definitions of a related control, based on function, which are accounted for during evaluation of SSHE. The controls defined in this regulation are:

- Adaptive start control
- Black bulb sensor
- Control accuracy
- Distance control option
- Electronic room temperature control
- Electronic room temperature control plus day timer
- Electronic room temperature control plus week timer
- Mechanic thermostat room temperature control
- Idle mode
- Network
- Networked standby
- Off mode
- Self-learning
- Single stage heat output, no temperature control
- Standby mode
- Two or more manual stages, no room temperature control
- Working time limitation.

39. Do you have views on the categorisation of control functions which can be provided to local space heaters as set out in Paragraph 2 of the SI Draft? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

Minimum requirements on heat control

In addition to SSHE requirements to assess the efficiency of a product, we are proposing three criteria for ecodesign requirements of local space heating products, outlined below:

Criteria 1: Electric storage local space heaters shall be equipped with electronic heat charge control with room and/or outdoor temperature feedback and fan assisted heat output.

Criteria 2: Towel rails with a nominal heat output equal or below 60 W shall only be operable through a working time limitation with a maximum pre-set period of time no longer than 6 hours.

Criteria 3: Electric local space heaters placed on the market without control shall not be able to provide heat output without control.

- 40. Do you have views on the proposal to require electronic heat charge control with temperature feedback, and fan-assisted heat output as set out in draft SI Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 41. Do you have views on the proposed time limitation of towel rails of ≤ 60 W heat output as set out in SI Draft Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer**
- 42. Do you have views on the proposed requirement for all local space heating products to require control to provide heat output as set out in draft SI Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Power consumption whilst not in active use

Alongside ecodesign requirements, we are proposing that the power consumptions of the product be limited whilst not actively providing heat. These measures, outlined per mode in Tables 4-6 intend to align with the EU regulation 2023/826, which we intend to consult on separately in due course.

Proposed power consumption requirements

Table 4: Proposed maximum permitted power consumption of local space heaters (in W) by mode.

Product Type	Proposed requirements	Proposed maximum power consumption (W)
Local space heaters with inbuilt control	Off mode	0.3
	Idle mode	Related to functionality, see Idle mode table
	Standby mode	Related to functionality, see Standby mode table.

Proposed standby mode table

Table 5: Proposed maximum permitted power consumption of local space heating products in standby mode.

Standby mode type	Proposed power consumption (W)
Display information or status	1
Provides a networked standby mode	2
Communication between heat generator and control is wireless	3
All other cases	0.5

Proposed idle mode table

Table 6: Proposed maximum permitted power consumption of local space heating products in idle mode

Idle mode condition	Proposed power consumption (W)
If local space heaters require input from a network	3
All other cases	1

43. Do you agree with the proposed power consumption thresholds in i) off, ii) idle or iii) standby mode as set out in Schedule 2 of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

Part 3: Supporting a Circular economy

Alongside energy demand during operation, another key contributor to emissions from local space heating products are associated with production and disposal of the products. There are clear benefits to introducing circularity measures to local space heating for consumers and wider society, with reduced environmental damage from materials' extraction. In allowing access to spare parts and repair information, we expect to promote longer product lives and greater resource efficiency, disincentivising the need for product replacement at the first instance of an operating fault.

In this part of the consultation, we are proposing a series of measures, to support repair in GB. In doing this, we hope to promote a culture of repair in relation to energy-related products in GB.

Chapter 5: Right to repair

Introduction

This section contains proposals to support circular economy measures, listing specific spare parts and durations for which a manufacturer should supply them.

In ensuring the provision of spare parts, it is possible to repair local space heating products which would otherwise be disposed of. Whilst difficult to quantify the impacts of these measures, the savings associated with right to repair are widely understood to be positive.

Spare part availability

Spare part supply is a crucial aspect of promoting the right to repair. The full proposed list of spare parts required to be provided by suppliers of LSH products is outlined in Annex E, encompassing parts such as controls, circuit boards, sensors and switches.

We are proposing that manufacturers should ship these parts within 10 working days, allowing approved installers to conduct timely repair of products.

44. Do you have views on how the proposed requirement to provide spare parts as set out in Schedule 1 of the draft SI may impact the amount of raw materials used to produce local space heating products?

Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

- 45. Do you have views on the proposed requirement for manufacturers to make available spare parts for local space heating products (see Annex E), and how this compares to current stock strategy? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 46. Do you have views on the proposed required time scale of 10 working days to ship these parts as set out in Schedule 1 of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Access to information on repair for installers

Whilst we are advocating for the provision of spare parts to enable repair of local space heating products, we are aware that some appliances, especially gas-powered ones, should only be maintained by a professional repairer. A balance of ensuring repair information is accessible, but only to approved repairers is therefore likely to be important.

To enable this, we propose that manufacturers, importers or approved representatives must set out a process, described on their website, for access to repair information for supported local space heater products. Before granting access to repair information, manufacturers must require the repairer to demonstrate sufficient technical competence (e.g. Gas Safe registration) and insurance for liabilities.

- 47. Do you agree with the proposed requirement for manufacturers to provide information to professional repairers, contingent on suitability checks as set out in Schedule 1 of the draft SI ? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 48. Do you have views on how the suitability check of a professional repairer should be conducted? Please provide evidence or reasoning to support your answer.**

To facilitate timely access to repair information, we are proposing that the manufacturer, importer, or approved representative evaluate this information within 5 working days, approving or rejecting the request. Once approved, we propose that repair information should be available within 1 working day.

- 49. Do you have views on the proposed requirement and timelines for registering a 'professional repairer', or providing repair information as set out in Schedule 1 of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

50. What impact (If any) do you feel that these proposals (or others in this document, please state) will have on small and medium businesses? Please provide evidence or reasoning to support your answer.

Chapter 6: Consumer protection

Introduction

We wish to ensure that consumers are provided with adequate information to make informed choices on operation of local space heating products. On this basis, we are proposing to ensure that phrasing and performance documentation are adequately signposted for consumers.

Circumvention refers to the intentional changes in performance characteristics of a local space heating product under test. Using defeat devices, software, or firmware updates, manufacturers can set a product to obtain a more favourable result for standards testing than it would under normal operation.

The use of such methods increase emissions of more carbon and other greenhouse than estimated, resulting in greater fuel consumption and increased bills for consumers.

Circumvention

We propose that manufacturers should be prohibited from circumventing testing of energy-related products. Examples of such circumvention include changes to firmware to artificially run a ‘test’ programme, changing parameters used to calculate SSHEE, or ‘defeat devices’ which recognise that they are under test, and modify behaviour in a related way.¹⁰

51. Do you have views on the proposed inclusion of a provision banning the use of circumvention measures, such as firmware or software updates as set out in the paragraph 8 of the draft SI? Yes/No/Don’t know. Please provide evidence or reasoning to support your answer.

¹⁰ Whilst awaited [EU amendments](#) propose to remove article 6 from Commission Regulation (EU) 2024/1103, this is only because it duplicates the anti-circumvention provision in Regulation (EU) 2024/1781. Given Regulation (EU) 2024/1781 is not replicated in GB law we have opted to align with article 6 in our proposed SI.

Documentation and mandatory phrasing

To ensure the local space heating products are used as intended, we are proposing a series of mandatory requirements on the packaging and marketing. This will include both operational controls, indicating control requirements, and phrasing for marketing and on safe usage.

Control functions

As outlined in the Draft SI, Schedule 1, Part 5, we are proposing a requirement that manufacturers include information on the type of temperature control that a 'related control' can provide.

We are proposing that the control be split into two sections, firstly the type of temperature control, function numbers, based on the type of control which it can provide. The full table is set out in the Draft SI, Table 6.

52. Do you have views on the proposed mandatory phrasing for products which require a separate related control as set out in Schedule 1 of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

'Flueless' and 'Open to chimney' local space heaters

In addition to the phrasing around the use of a control function, we are proposing to retain existing mandatory phrasing from the existing GB regulation of flueless and open to chimney local space heaters. We are proposing that the phrasing "*This product is not suitable for primary heating purposes*" be featured prominently, on the product packaging, on the front cover of the manual of the product, and with the characterisation of the product on free access manufacturer websites.

53. Do you have views on the proposed mandatory phrasing for flueless and open to chimney local space heaters as set out in Schedule 1 of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

Review

Should the proposals in the consultation be implemented, we will ensure that a review of their impact is completed. This will include assessment of the benefits and impact to consumers and business across the UK, and whether the scope of products included should be modified. We will also assess whether the thresholds remain suitable, with reference to technological developments. To allow sufficient time for policy impact review, we are proposing that a policy review be conducted after implementation on or before 9 May 2031.

- 54. In the absence of regulatory changes in GB, to what extent would industry voluntarily observe EU regulation? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 55. Do you have views on the proposed date for review of local space heating regulations as proposed? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Alignment with the EU regulation

We are aware that the EU has recently published draft amendments¹¹ to the existing text of 2024/1103. We are proposing to align with these draft amendments and this intention should be reflected in our draft SI. The only caveat is that we are proposing to retain article 6. Our approach to the changes in the amendment are as follows:

Changes to tables: We are intending to align the updates to tables with the EU amendment.

Changes to technical definitions: We are intending to align our definitions with the amended EU regulations.

Circumvention: We are intending to retain the ban on circumvention, aligned with the current text of article 6 of 2024/1103. The EU is removing this in favour of cross-cutting regulation, however we are proposing to retain this in-text.

Designated standards: We are intending to align the definitions in designated standards, which are hosted in a separate Annex to this consultation.

56. Do you have any views on the proposals to adopt the text amended by the EU? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.

¹¹ [Ecodesign requirements for local space heaters – amendments to Commission Regulation \(EU\) 2024/1103 \(implementing act\)](#)

Equality Act 2010

Under the Public Sector Equality Duty, the Government must take steps to understand how policies will affect different groups in society in different ways, with a particular focus on removing or minimising disadvantages suffered by people due to the following protected characteristics: age; gender reassignment; being married or in a civil partnership; being pregnant or on maternity leave; disability; race including colour, nationality, ethnic or national origin; religion or belief; sex; and sexual orientation. Warm homes and thermal comfort play a crucial role in maintaining our health and wellbeing. Evidence suggests that in homes with a lower level of thermal comfort, elderly, pregnant and disabled groups may be particularly affected and at an elevated risk of negative health outcomes.

**57. Do you have views on the extent to which this policy may affect people with protected characteristics under the 2010 Equality Act?
Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Annex A: Glossary

This annex defines technical references and phrases used throughout this public consultation document.

Term	Description
CE marking	The Conformité Européenne (CE) mark is the conformity mark used in the EU. It shows that a product meets all the relevant EU requirements and has been assessed as such.
Commodity codes	Commodity codes are an internationally recognised method for defining types of goods for customs purposes as they are traded between countries. When a product is imported or exported across a border, a commodity code must be provided so the correct customs measures are applied.
Ecodesign	Ecodesign is the legislative framework for setting the minimum efficiency performance standards (MEPS) for energy-related products, including for space heating appliances. Ecodesign aims to phase out the least efficient energy-related products from the market through these standards and other measures.
Local space heater	A local space heating product is designed and marketed specifically to provide thermal comfort in an enclosed area.
Mandatory phrasing	Specific requirements to include detail or wording relating to the use case or specifics of a product.
Minimum Energy Performance Standards (MEPS)	Minimum Energy Performance Standards, or 'MEPS' refer to minimum requirements set out in ecodesign legislation. Factors such as energy efficiency, fuel type, and control functions are accounted for to produce a single figure, used to evaluate each product within a category.
Related control	A device which is both marketed and sold separately from a local space heating product, which is capable of regulating its ability to provide and moderate its operation.
Right to repair	A series of measures designed to ensure that customers are able to repair their products, extending their usable lifespan.

Externally driven supplementary heating units	A product marketed for the purpose of providing thermal comfort to humans in an indoor space which cannot operate without an input from an external control. These products are also referred to as 'slave' heating units.
Statutory Instrument	Statutory instruments are the most common form of secondary (or delegated) legislation. The power to make a statutory instrument is set out in legislation and nearly always conferred on a Minister of the Crown.
UKCA marking	The United Kingdom Conformity Assessment (UKCA) mark is the conformity mark used in the UK. It shows that a product meets all the relevant EU requirements and has been assessed as such
Windsor Framework	An agreement between the EU and the UK, aimed to ease the supply of goods between Great Britain, Northern Ireland and the Republic of Ireland.

Annex B: List of Consultation questions

This public consultation contains 57 questions, which will help government to assess the viability of the proposed SI. Questions contained in the public consultation are as follows:

- 1. Do you believe that the product category definitions outlined above should be modified from their current state? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 2. Do you have views on the proposed change to include 'externally driven supplementary heating units' in the scope of ecodesign regulations? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 3. Do you have a view on whether the requirement for a form of control, such as a timer, on a local space heating product represents a benefit to consumers? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 4. Do you agree to include a definition of balanced flue local space heating product category as set out in the attached draft SI, Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 5. Do you agree to include a definition of electric portable local space heating product category as set out in the attached draft SI, Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 6. Do you agree to include a definition of electric fixed local space heating as set out in the attached draft SI, Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 7. Do you have any views on the proposed change to the definition of Electric underfloor local space heating products as set out in attached draft SI Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 8. Do you agree to include a definition of electric visibly glowing radiant portable local space heating products as set out in the attached draft SI, Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

- 9. Do you have views on the proposal to separate ecodesign performance of towel rails from fixed electric local space heaters? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 10. Do you have views on the proposal to categorise ecodesign performance of towel rails as equal to or below 60 W, above 60, and equal to or below 250 W, and above 250 W as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 11. Do you have views on the proposed increased scope set at 50 kW or lower for domestic local space heating products as set out in paragraph 3a of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 12. Do you have views on the proposed increased scope set at 300 kW or lower for commercial local space heating products as set out in paragraph 3b of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 13. Do you feel the product categories proposed in this consultation accurately reflect the distribution of products sold on the GB market? How do you view this changing in the next 5 to 10 years? Please provide evidence or reasoning to support your answer.**
- 14. Do you believe that the proposed regulatory changes, as set out in the attached draft SI, could restrict/affect the ability of manufacturers to bring multi-functional products to market? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 15. Do you have a view on the testing methodologies currently used to calculate parameters used in seasonal space heating efficiency calculations? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 16. What innovation do you envisage in the local space heating product area will be driven by this proposed regulatory change? Please provide evidence or reasoning to support your answer.**
- 17. Do you have any views on the proposal to include designated standards? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

- 18. Do you have any views on the validity and current day relevance of the 'transitional' testing methods, hosted on the designated standards website? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 19. Do you agree with lowering the Primary Energy Factor for electricity to 1.9 as set out in draft SI schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 20. Do you agree with the proposed threshold for open fronted and open to chimney local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 21. Do you agree with the proposed threshold for closed fronted open combustion local space heating products as set out in SI Draft Schedule 1 Part 2 ? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 22. Do you agree with the proposed threshold for balanced flue local space heating products as set out in SI Draft Schedule 1 Part 2 ? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 23. Do you agree with the proposed threshold for electric portable local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 24. Do you agree with the proposed threshold for electric fixed local space heating products of nominal output above 250 W as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 25. Do you agree with the proposed threshold for electric fixed local space heating products of nominal output equal to or below 250 W as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 26. Do you agree with the proposed threshold for electric storage local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

- 27. Do you agree with the proposed threshold for electric underfloor local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 28. Do you agree with the proposed threshold for electric visibly glowing radiant local space heaters with a nominal heat output above 1.2 kW, except electric visibly glowing radiant portable local space heaters local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 29. Do you agree with the proposed threshold for electric visibly glowing radiant local space heaters with a nominal heat output equal or below 1.2 kW, except electric visibly glowing radiant portable local space heaters local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 30. Do you agree with the proposed threshold for electric visibly glowing radiant portable local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 31. Do you agree with the proposed threshold for luminous local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 32. Do you agree with the proposed threshold for tube local space heating products as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 33. Do you agree with the proposed threshold for towel rails with a nominal heat output above 250 W as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 34. Do you agree with the proposed threshold for towel rails with a nominal heat output above 60 W and equal or below 250 W as set out in SI Draft Schedule 1 Part 2? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

- 35. Do you have a view on whether the requirements should apply at the point of being 'placed on the market', or at point of 'coming into service'. Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 36. Aside from costs associated with complying with new minimum performance standards, do you expect there to be any additional costs associated with aligning GB regulatory standards with the EU? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 37. Do you have views on the new proposed nitrogen oxide limits as set out in the SI draft Schedule 1 part 7? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 38. Do you foresee any technical feasibility issues with complying with the proposed nitrogen oxide emission limits? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 39. Do you have views on the categorisation of control functions which can be provided to local space heaters as set out in Paragraph 2 of the SI Draft? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 40. Do you have views on the proposal to require electronic heat charge control with temperature feedback, and fan-assisted heat output as set out in draft SI Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 41. Do you have views on the proposed time limitation of towel rails of ≤ 60 W heat output as set out in SI Draft Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 42. Do you have views on the proposed requirement for all local space heating products to require control to provide heat output as set out in draft SI Schedule 1? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 43. Do you agree with the proposed power consumption thresholds in i) off, ii) idle or iii) standby mode as set out in Schedule 2 of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

- 44. Do you have views on how the proposed requirement to provide spare parts as set out in Schedule 1 of the draft SI may impact the amount of raw materials used to produce local space heating products? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 45. Do you have views on the proposed requirement for manufacturers to make available spare parts for local space heating products (see Annex E), and how this compares to current stock strategy? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 46. Do you have views on the proposed required time scale of 10 working days to ship these parts as set out in Schedule 1 of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 47. Do agree with the proposed requirement for manufacturers to provide information to professional repairers, contingent on suitability checks as set out in Schedule 1 of the draft SI ? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 48. Do you have views on how the suitability check of a professional repairer should be conducted? Please provide evidence or reasoning to support your answer.**
- 49. Do you have views on the proposed requirement and timelines for registering a 'professional repairer', or providing repair information as set out in Schedule 1 of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 50. What impact (If any) do you feel that these proposals (or others in this document, please state) will have on small and medium businesses? Please provide evidence or reasoning to support your answer.**
- 51. Do you have views on the proposed inclusion of a provision banning the use of circumvention measures, such as firmware or software updates as set out in the paragraph 8 of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 52. Do you have views on the proposed mandatory phrasing for products which require a separate related control as set out in Schedule 1 of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

- 53. Do you have views on the proposed mandatory phrasing for flueless and open to chimney local space heaters as set out in Schedule 1 of the draft SI? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 54. In the absence of regulatory changes in GB, to what extent would industry voluntarily observe EU regulation? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 55. Do you have views on the proposed date for review of local space heating regulations as proposed? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 56. Do you have any views on the proposals to adopt the text amended by the EU? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**
- 57. Do you have views on the extent to which this policy may affect people with protected characteristics under the 2010 Equality Act? Yes/No/Don't know. Please provide evidence or reasoning to support your answer.**

Annex C: Parameters used for SSHE calculation

The parameters used to calculate SSHE for all local space heaters are defined in the table below.

Table 7: Definitions of parameters used to calculate seasonal space heating efficiency in the draft act.

Parameter	Name	Description
η_s	Seasonal Space Heating Efficiency (SSHE)	The ratio between the space heating demand, supplied by a local space heater and the annual energy consumption required to meet this demand, expressed in %.
$\eta_{S,RF}$	The emission efficiency, expressed in %.	
$\eta_{S,th}$	The weighted thermal efficiency, expressed in %.	
$\eta_{th,nom}$	The useful efficiency at nominal heat output, expressed in %.	
$\eta_{s,on}$	Seasonal space heating in active mode.	
CC	Primary Energy Factor Conversion Coefficient	(CC) means the default coefficient for primary energy per kWh.
RF _s	Radiant factor of the commercial local space heater, expressed in %.	
F(1)	Correction factor 1	A correction factor accounting for a negative contribution to seasonal space heating efficiency due to adjusted contributions for options for the heat output, expressed in %.
F(2)	Correction factor 2	A correction factor accounting for a positive contribution to the seasonal space heating energy efficiency due to adjusted contributions of controls of indoor heating comfort, the values

		of which are mutually exclusive, cannot be added to each other.
F(3)	Correction factor 3	A correction factor accounting for a positive contribution to the seasonal space heating energy efficiency due to adjusted contributions of controls for indoor heating comfort, the values of which can be added to each other.
F(4)	Correction factor 4	A correction factor accounting for a negative contribution to the seasonal space heating energy efficiency by auxiliary electricity consumption, expressed in %.
F(5)	Correction factor 5	A correction factor accounting for a negative contribution to the seasonal space heating energy efficiency by energy consumption of a permanent pilot flame, expressed in %.
F _{env}	The envelope losses of the heat generator, expressed in %.	

Annex D: Proposed formula changes

The table in this annex details key formula used to calculate efficiency in the proposed SI. For clarity, the equivalent formula in the existing GB regulation is provided. Parameter definitions are included in the SI.

Parameters	Existing GB formula (2015/1188)	Proposed formula (SI draft)
Seasonal space heating efficiency η_5	$\eta_{S,on} - 10 \% F(1) - F(4) - F(5)$ (Commercial)	$\eta_{S,on} - F(1) - F(4) - F(5)$ (Commercial)
	$\eta_{S,on} - 10 \% F(1) + F(2) + F(3) - F(4) - F(5)$ (non-commercial)	$\eta_{S,on}$ (Gas, liquid, except Commercial)
		$\frac{\eta_{S,on}}{CC}$ (Electric)
$\eta_{S,on}$	$\eta_{th,nom}$ (Except electric and commercial)	$\eta_{th,nom} \times (0.75 + F(2) + F(3)) \times F(4) \times F(5)$ (non-Commercial)
	$\frac{1}{CC} \times \eta_{th,on}$ (Electric)	$\frac{\eta_{S,th} \times \eta_{S,RF}}{100 \%}$ (Commercial)
	$\eta_{S,th} \times \eta_{S,RF}$ (Commercial)	
$\eta_{S,th}$		$(0.15 \times \eta_{th,nom} + 0.85 \eta_{th,min}) - F_{env}$ (Tube)
Emission efficiency ($\eta_{S,RF}$)		$\frac{(0.94 RF_s) + 0.19}{(0.46 RF_s) + 0.45}$ (Commercial)
Radiant factor (RF_s)		$0.15 RF_{nom} + 0.85 RF_{min}$ (All commercial except tube)

	$\sum_{i=1}^n (0.15 RF_{nom,i} + 0.85 RF_{min}) \times \frac{P_{heater,i}}{P_{system}} \quad (Tube)$	
F(1)	No change, see tables in SI draft	
F(2)	No change, see tables in SI draft.	
F(3)	No change, see tables in SI draft.	
F(4)	$CC \times \frac{\alpha \times el}{P_{nom}} \times 100 \% \quad (Electric)$ $CC \times \frac{0.2 el_{max} + 0.8 el_{min} + 1.3 el_{sb}}{P_{nom}} \times 100 \% \quad (Gas\ or\ liquid))$ $CC \times \frac{0.15 el_{max} + 0.85 el_{min} + 1.3 el_{sb}}{P_{nom}} \times 100 \% \quad (Commerical)$	$= 1 \quad (Electric)$ $\frac{1}{1 + \left(CC \times \frac{0.2 el_{max} \times 0.8 el_{min}}{P_{nom}} \right)} \quad (Gas, liquid)$ $CC \times \frac{0.15 \times el_{max} + 0.85 el_{min}}{P_{nom}} \times 100 \% \quad (Commerical)$
F(5)	$0.5 \times \frac{P_{pilot}}{P_{nom}} \times 100 \% \quad (Gas\ or\ liquid\ fuel)$ $4 \times \frac{P_{pilot}}{P_{nom}} \times 100 \% \quad (Commerical)$	$\frac{1}{1 + \left(\frac{P_{pilot}}{P_{nom}} \right)} \times 100 \% \quad (Gas\ or\ liquid)$ $4 \times \frac{P_{pilot}}{P_{nom}} \times 100 \% \quad (Commerical)$ $= 1 \quad (Electric)$

Annex E: Spare part requirements

As part of this proposal to raise ecodesign standards, we are advocating for a requirement to provide a range of spare parts, giving consumers the 'right to repair' their products through the use of an approved installer. The spare part requirements in the proposed SI are dependent on the type of local space heater, listed below.

1. For electric portable local space heaters and electric visibly glowing radiant portable local space heaters:
 - 1.1. Control,
 - 1.2. Ambient thermostat (only for electric portable local space heaters),
 - 1.3. Motor for heaters equipped with a fan (only for electric portable local space heaters),
 - 1.4. Printed circuit boards,
 - 1.5. Display or status indicators,
 - 1.6. Impellers,
 - 1.7. Control sensors,
 - 1.8. Buttons and switches,
 - 1.9. Remote control sensors.

2. for electric fixed local space heaters, towel rails and electric underfloor local space heaters:
 - 2.1. Control,
 - 2.2. Ambient thermostat,
 - 2.3. Floor sensor (only for electric underfloor local space heaters),
 - 2.4. Repair kit for heating cables (only for electric underfloor local space heaters),
 - 2.5. Fixation brackets (if needed),

2.6. Printed circuit boards,

2.7. Display or status indicators,

2.8. Impellers,

2.9. Control sensors,

2.10. Buttons and switches,

2.11. Remote control sensors.

3. For electric storage local space heaters:

3.1. Heating elements,

3.2. Control,

3.3. Safety switches,

3.4. Connection cables,

3.5. Housing for mechanical parts,

3.6. Fixation brackets,

3.7. Fans and impellers,

3.8. Printed circuit boards,

3.9. Display or status indicators,

3.10. Control sensors,

3.11. Buttons and switches,

3.12. Remote control sensors.

4. For electric visibly glowing radiant local space heaters, except electric visibly glowing radiant portable local space heaters:
 - 4.1. Control,
 - 4.2. Heating elements,
 - 4.3. Connection cables,
 - 4.4. Fixation brackets,
 - 4.5. Printed circuit boards,
 - 4.6. Display or status indicators,
 - 4.7. Impellers,
 - 4.8. Control sensors,
 - 4.9. Buttons and switches.

Annex F: Transitional methods

Transitional methods used to calculate efficiency of local space heaters are listed below.

Gaseous fuel local space heaters

Table 8: Transitional methods for parameter calculation, relating to gaseous fuel local space heaters, except luminous heaters and tube heaters.

Parameter	Reference	Notes
Direct heat output	EN 613:2021 §7:11	Heat output to the space in which the product is installed. Calculated using the formula: $\text{Direct heat output} = Q_n * \eta$ Where Q_n is nominal heat output, and η is the nominal efficiency. Direct heat output shall be calculated as Gross Calorific Value.
Indirect heat output		For the purpose of declaration and verification the principles as applied in EN 16510-1 may be used.
Useful efficiency at nominal heat output $\eta_{th,nom}$, $\eta_{th,min}$	EN 613:2021 § 7.11.2 EN 1266:2002 § 6.12 & § 7.12.2 EN 13278:2013 § 6.12 & § 7.12.2	In EN 613, $\eta_{th,nom}$, $\eta_{th,min}$ shall be calculated as η in conditions applicable to the nominal and minimum heat output, if relevant. In EN 1266 and EN 13278 $\eta_{th,nom}$, corresponds to η if determined with nominal heat input. $\eta_{th,min}$ corresponds to η if determined with minimum heat input. All values shall be based on net calorific value.
Nominal heat output, minimum heat output, P_{nom} , P_{min}	EN 613:2021 EN 1266:2002 § 6.3.1 & § 6.3.3 & § 7.3.1 & § 7.3.5 § 6.12 & § 7.12 EN 13278:2013 § 6.3.1 & § 6.3.3 & § 7.3.1 & § 7.3.5 & § 6.12 & § 7.12.2 EN 449:2002+A1:2007 § 5.15.1 & §	In EN 613 P_{nom} shall be determined as $P_{nom} = Q_n * \eta$, applicable to nominal output conditions. For Q_n see § 7.3.1. P_{min} shall be determined as $P_{min} = \text{minimum heat output} * \eta$. For minimum heat output see § 7.3.5.

	5.15.2 & § 6.15.1 & § 6.15.2	<p>In EN 1266, EN 13278:2013 and EN 449, P_{nom} shall be determined by $P_{nom} = Q_n * \eta_{th,nom}$</p> <p>$P_{min}$ shall be determined by $P_{min} = Q_n * \eta_{th,min}$</p> <p>All values shall be based on net calorific value.</p>
Electrical power consumption at nominal heat output: el_{max}	EN 15456:2008: § 5.1.3.1.	Where el_{max} corresponds to $P_{aux,100}$, measured at nominal load operation.
Electrical power consumption at minimum heat output: el_{min}	EN 15456:2008: § 5.1.3.2	Where el_{min} corresponds to $P_{aux,30}$, measured at part load operation.
Electrical power consumption On standby: el_{sm}	EN 15456:2008: § 5.1.3.3 EN 50564:2011 § 5.3	Where el_{sm} corresponds to either $P_{aux,sb}$ (EN 15456: 2008) or the term <i>power consumption in standby mode</i> (EN 50564:2011)
Emissions of nitrogen oxide	EN 613:2021 § 7.7.4 EN 1266:2002 § 7.7.4 & Annex G EN 13278:2013 § 7.7.4 & Annex H Flueless heaters: EN 14829:2007 § 7.9.4	<p>For EN 613, EN 1266, and EN 13278, emissions are established as weighted values over the full-modulating minimum load conditions.</p> <p>EN 14829 provides a test method for flueless heaters.</p>
Permanent pilot flame power P_{pilot}	EN 1266:2002 § 7.3.4	EN613 and EN13278 are omitted as they do not describe how to calculate the heat input of the ignition burner.
Control accuracy and control setpoint deviation	The control accuracy for gaseous fuel local space heaters is not described in EN standards. For the purpose of declaration and verification the principles as applied in EN 15500-1 shall be used.	

Liquid fuel local space heaters

Table 9: Transitional methods for parameter calculation, relating to liquid fuel local space heaters, except luminous heaters and tube heaters.

Parameter	Reference	Notes
Direct heat output	EN 613:2021 §7:11	Heat output to the space in which the product is installed. Calculated using the formula: $\text{Direct heat output} = Q_n * \eta$ Where Q_n is nominal heat output, and η is the nominal efficiency. Direct heat output shall be calculated as Gross Calorific Value.
Indirect heat output	The indirect heat output of liquid fuel local space heaters is not described in EN standards. For the purpose of declaration and verification the principles as applied in EN 16510-1 shall be used.	
Useful efficiency at nominal and minimum heat output $\eta_{th,nom}$, $\eta_{th,min}$	EN 1:1998 § 6.6.1.2 EN 13842:2004 § 6.5.6	For EN 1, $\eta_{th,nom}$ corresponds to η at maximum flow rate, and $\eta_{th,min}$ shall be determined as η at minimum oil flow rate. For EN 13842, $\eta_{th,nom}$ is calculated as $\eta_{th,nom} = 1 - q_A$, where q_A is measured at nominal/minimum heat output. All measurements should be calculated based on Net Calorific Value.
Nominal heat output, minimum heat output P_{nom} , P_{min}	EN 1:1998/A1:2007 § 6.5.2.1 EN 13842:2004: § 6.3.	EN 1: Parameter corresponds to P at maximum (P_{nom}) and minimum (P_{min}) oil flow rate. EN 13842: For nominal and minimum conditions, heat output can be calculated as: $Q_o * (1 - q_a)$.
Electrical power consumption at nominal heat output el_{max}	EN 15456:2008 § 5.1.3.1	Parameter el_{max} corresponds to $P_{aux,100}$ in EN15456.
Electrical power consumption at	EN 15456:2008, § 5.1.3.2.	Parameter el_{min} corresponds to $P_{aux,30}$ in EN15456.

minimum heat output $e_{l_{min}}$		
Standby power mode power consumption P_{sm}	EN 15456:2008, § 5.1.3.3. or EN 50564:2011§ 5.3.	EN15456: Corresponds to $P_{aux, sb}$ EN 50564: Corresponds to the power consumption in standby mode.
Emissions of nitrogen oxides	EN 1:1998/A1:2007 § 6.6.4 EN 13842 Annex C7	For declaration and verification the method according to EN 1 shall be used.
Permanent pilot flame power P_{pilot}	EN 1266:2002, § 7.3.4	For declaration and verification of such a power requirement the method as in EN1266:2002, § 7.3.4 shall be used.
Control accuracy and control to setpoint deviation	The control accuracy of liquid fuel local space heaters is not described in EN standards. For the purpose of declaration and verification the principles as applied in EN 15500-1 shall be used.	

Electric local space heaters

Table 10: Transitional methods for parameter calculation, relating to electric local space heaters.

Parameter	Reference	Notes
Nominal heat output P_{nom}	For electric portable, fixed heaters and underfloor heaters: EN 60675:1995/A11:2019 Clause 16C.	Following EN 60675:1995/A11:2019 if there is no indirect heat output the maximum continuous heat output (clause 16A) will be equal to the nominal heat output.
	For electric storage heaters: EN 60531:2000/A11:2019 § 9.3	<p>nom corresponds to the following applicable standards:</p> <p>IEC/EN 60335-1: Household and similar electrical appliances — safety — rated voltage: 250 V for singlephase appliances, up to 480 V for others, not intended for appliances for domestic use as usual.</p> <p>IEC/EN 60335-2-30: Household and similar electrical appliances — safety — particular requirements for room heaters.</p> <p>IEC/EN 60335-2-43: Household and similar electrical appliances - Safety - Part 2-43: Particular requirements for clothes dryers and towel rails.</p> <p>IEC/EN 60335-2-61: Household and similar electrical appliances — safety — particular requirements for thermal storage room heaters.</p> <p>IEC/EN 60335-2-96: Household and similar electrical appliances — safety — particular requirements for flexible sheet heating elements for room heating.</p> <p>IEC/EN 60335-2-106: Household and similar electrical appliances — safety — particular</p>

		<p>requirements for heated carpets and for heating units for room heating.</p> <p>IEC/EN 60531:1991. Household electric thermal storage room heaters — methods for measuring performance</p>
<p>Maximum continuous heat output $P_{max,c}$</p>	<p>For electric portable, fixed heaters and underfloor heaters: EN/IEC 60675:1995/A11:2019 Clause 16 A</p>	<p>Parameter $P_{max,c}$ corresponds to the usable power in IEC 60675.</p>
<p>Standby mode power consumption P_{sm}</p>	<p>EN 50564:2011 § 5.3</p>	<p>Corresponds to the parameter ‘power consumption in standby mode’.</p>
<p>F(2) and F(3)</p>	<p>For electric portable, fixed heaters and underfloor heaters: EN 60675:1995/A11:2019 § 17.</p>	<p>EN 60675 provides test methods for all control functions corresponding to F(2) and F(3), except for control accuracy and self-learning functionality.</p>
<p>Control accuracy and control to setpoint deviation</p>	<p>EN 15500-1:2017 § 5.4 & § 6.</p>	

Luminous and tube local space heaters

Table 11: Transitional methods for parameter calculation, relating to luminous heaters and tube heaters.

Parameter	Reference	Notes
Useful efficiency at nominal and minimum heat output $\eta_{th,nom}, \eta_{th,min}$	Tube local space heaters with tube segments other than strips: EN 416:2019 § 7.6.5. Tube local space heaters which tube segments are strips: EN 17175:2019.	
Nominal heat output, minimum heat output P_{nom}, P_{min}	Luminous local space heaters: EN 419:2019 Tube local space heaters with tube segments other than strips: EN 416:2019 Tube local space heaters which tube segments are strips: EN 17175:2019.	For luminous and tube local space heaters, the heat output is calculated At nominal heat or minimum output per: $heat\ output = Q_n * Useful\ efficiency$ All values shall be based on gross calorific value of fuel.
Envelope loss factor, F_{env}	EN 1886:2007 § 8.2.1	Use of F_{env} depends on class T1 to T5 as established by EN 1886.
Radiant factor (nominal and minimum) RF_{nom}, RF_{min}	Luminous local space heaters: EN 419:2019: § 7.6.3 Tube local space heaters: EN 416:2019 § 7.5.3 Tube local space heaters which tube segments are strips: EN 17175:2019	RF at nominal heat output corresponds to R_f in the standard. RF at minimum heat output corresponds to R_f , but measured at minimum heat output. Calculation of R_f shall be based on net calorific value.
Electrical power consumption at nominal heat output, el_{max}		EN 416:2019 § 6.4.2 EN 419:2019 § 6.8.2 EN 17175:2019
Electrical power consumption at minimum heat output, el_{min}		EN 416:2019 § 6.4.3 EN 419:2019 § 6.8.3 EN 17175:2019

Standby mode power consumption, P_{sm}	EN 416:2019 § 6.4.4 EN 419:2019 § 6.8.4 EN 17175:2019 EN 50564:2011	Corresponds to power consumption in standby mode in EN 50564.
Permanent pilot flame power, P_{pilot}	Neither standard EN 416 nor EN 419, nor EN 17175 describes a method for determining a power requirement for a permanent pilot flame (ignition burner). For declaration and verification of such a power requirement the method as in EN1266:2002, § 7.3.4 shall be used.	

Controls

Table 12: Transitional methods for parameter calculation, relating to local space heating controls.

Parameter	Reference	Notes
Off mode, P_o	EN 15500-1:2017 § 5.3.2 & § 6.1 EN 50564:2011 § 5.3	EN 15500-1 defines the basic layout for testing controls separately from the local space heater, although it does not set out a specific method for testing off mode. A specific method for low power modes of household electrical appliances is laid down in EN 50564:2011, where the corresponding adaptations must be made to check controls.
Standby mode, P_{sm}	EN 15500-1:2017 § 5.3.2 & § 6.1 EN 50564:2011 § 5.3	EN 15500-1 defines the basic layout for testing controls separately from the local space heater, although it does not set out a specific method for testing standby mode. A specific method for low power modes of household electrical appliances is laid down in EN 50564:2011, where the corresponding adaptations must be made to check controls.
Idle mode, P_{idle}	EN 15500-1:2017 § 6.2.1	
Networked standby, P_{nsm}	EN 15500-1:2017 § 5.3.2 & § 6.1 EN 50564:2011 § 5.3	EN 15500-1 defines the basic layout for testing controls separately from the local space heater, although it does not set out a specific method for testing networked standby mode. A specific method for low power modes of household electrical appliances is laid down in EN 50564:2011, where the corresponding adaptations must be made to check controls.
Standby mode with display or information status	EN 15500-1:2017 § 5.3.2 & § 6.1 EN 50564:2011 § 5.3	EN 15500-1 defines the basic layout for testing controls separately from the local space heater, although it does not set out a specific method for testing standby mode with display of information or status.

		A specific method for low power modes of household electrical appliances is laid down in EN 50564:2011, where the corresponding adaptations must be made to check controls.
Control accuracy and control to setpoint deviation	EN 15500-1:2017 § 5.4 & § 6.3.	

Annex G: Bibliography

Commodity codes used [Trade Tariff: look up commodity codes, duty and VAT rates - GOV.UK](#)

Current EU ecodesign legislation for local space heaters (2024/1103), available at [Regulation - 2024/1103 - EN - EUR-Lex](#)

Current GB ecodesign legislation for local space heaters (2015/1188), 'Commission Regulation (EU) 2015/1188', available at: <https://www.legislation.gov.uk/eur/2015/1188>

Description of how standardisation is regulated and adopted in the UK. [Standardisation - GOV.UK](#)

DESNZ (2023), 'Home Energy Model: Future Homes Standard assessment', Table 8, [Home Energy Model: Future Homes Standard assessment - GOV.UK](#)

List of testing standards for a range of products, including energy-related products [Designated standards - GOV.UK](#)

Pending amendment to EU ecodesign regulations [Ecodesign requirements for local space heaters – amendments to Commission Regulation \(EU\) 2024/1103 \(implementing act\)](#)

Regulation for energy labelling of local space heaters [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 \(Text with EEA relevance\)](#)

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