CIBSE Response to DESNZ Consultation on Updating Standards for Local Space Heating Products - May 2026

About CIBSE

The Chartered Institution of Building Services Engineers (CIBSE) is the leading global body for building services professionals, championing sustainability, innovation and building performance across the built environment. We empower and equip professionals with the expertise, guidance and standards needed to deliver safe, efficient, and future ready buildings. Through our leadership in decarbonisation, building performance and continuous professional development, we support a community dedicated to creating better places for people and the planet.

Contact: Technical@cibse.org

CIBSE Summary Statement

CIBSE welcomes the opportunity to respond to the Department for Energy Security and Net Zero (DESNZ) consultation on updating ecodesign standards for local space heating products in Great Britain (GB).

CIBSE supports the overall direction of the proposals, particularly where they:

- improve operational energy efficiency,
- reduce greenhouse gas emissions and air pollutants,
- improve controllability and consumer outcomes,
- support product durability and repairability,
- align Great Britain requirements with EU ecodesign provisions,
- support progress toward UK net zero objectives.

CIBSE considers that improved standards for local space heating products can contribute to reduced energy demand, lower operating costs, improved indoor environmental quality, and reduced lifecycle environmental impacts.

Where questions relate primarily to detailed product manufacturing, testing protocols, market surveillance procedures, or commercial implementation matters outside CIBSE's core technical remit, we have provided either limited observations or "No response."

Responses to Consultation Questions

Question 1

Do you believe that the product category definitions outlined above should be modified from their current state?

Response: Yes.

CIBSE supports clearer and more granular product categorisation where this improves regulatory clarity and enables more appropriate minimum energy performance standards (MEPS) to be applied to different technologies.

The proposed move from 12 to 15 categories appears reasonable and better reflects current market technologies, including towel rails and balanced flue products. Separate categorisation is appropriate where operational characteristics, control strategies, emissions profiles, or use cases differ materially.

From a building services engineering perspective, it is important that category definitions are technically unambiguous and technologically neutral where possible to avoid unintentionally constraining innovation, as these inform product selection, specification, and compliance assessments.

Question 2

Do you have views on the proposed change to include 'externally driven supplementary heating units' in the scope of ecodesign regulations?

Response: Yes.

CIBSE supports inclusion within scope.

Externally driven supplementary heating units are increasingly common in modern heating system designs, particularly in zone systems where a building management system or smart home controller manages heat output. Excluding these products from eco-design scope has allowed poorly performing products to enter the market without minimum efficiency requirements. From a systems design perspective, CIBSE notes that the efficiency of such products is inseparable from the quality of the control system driving them. Regulating these products alongside their related controls is therefore appropriate.

CIBSE recommends that the definition of 'externally driven supplementary heating unit' be sufficiently clear in the final SI to avoid overlapping with heat emitters that form part of central heating systems (e.g., radiators on a wet system), which are regulated under different frameworks.

Question 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?

Response: Yes.

CIBSE strongly supports mandatory controls.

Effective controls are fundamental to reducing unnecessary energy use and improving thermal comfort. Time control, temperature control, occupancy-based control, and adaptive control functions can significantly reduce overheating and avoid unnecessary operation.

Controls are particularly important for electric resistance heating products, where poor control strategies can materially increase operational costs and peak electricity demand. Uncontrolled local space heaters that run continuously represent a significant source of wasted energy. CIBSE emphasises that control is a fundamental component of energy-efficient heating system design.

A timer or thermostat control enables consumers to match heat output to occupancy and thermal comfort needs. The energy demand reduction potential of this measure is likely to be substantial, particularly for electric portable heaters which are frequently left running in unoccupied spaces.

CIBSE supports the proposal and recommends that guidance materials be made available to consumers explaining how to use controls effectively, as product capability alone is insufficient if consumers do not understand how to configure their devices.

Question 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?

Response: Yes.

CIBSE supports a distinct category for balanced flue products because their combustion and ventilation characteristics differ materially from open combustion systems.

The separation should improve clarity for performance assessment and consumer information, while supporting safer operation and potentially lower indoor pollutant exposure. CIBSE supports the inclusion of this definition to enable appropriate and distinct performance thresholds to be set for this product type.

Question 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?

Response: Yes.

CIBSE supports the proposed clarification.

The shift to a positive definition for electric portable local space heaters, requiring a cord and plug, moveability between rooms, and no fixed installation, is a practical

improvement on the previous exclusion-based definition. This approach is clearer for manufacturers, enforcement authorities, and building services practitioners.

CIBSE notes that portable electric heaters are widely used as supplementary heating in both domestic and non-domestic settings and represent a significant opportunity for energy demand reduction through improved minimum standards. We support this clarified definition and the associated performance threshold.

Question 6

Do you agree to include a definition of electric fixed local space heating as set out in the attached draft SI, Schedule 1?

Response: Yes.

CIBSE supports the revised definition and exclusion of technologies now covered separately. The amended definition of electric fixed local space heaters, which now explicitly excludes towel rails, portable electric heaters, and electric underfloor heating, provides greater clarity and ensures that each product type can be assessed against performance thresholds appropriate to its function and use case.

Question 7

Do you have any views on the proposed change to the definition of Electric underfloor local space heating products?

Response: Yes.

The addition of 'including self-regulating cables and mats' to the definition of electric underfloor local space heating products is a helpful clarification. Self-regulating heating cables are an increasingly common technology in underfloor applications (particularly for frost protection and comfort heating in bathrooms), and their explicit inclusion in scope ensures that these products are subject to appropriate eco-design requirements.

CIBSE supports this change. We would additionally note that the interaction between underfloor heating systems and floor construction (thermal mass, insulation) is important to overall efficiency and would encourage Government to consider whether there is a role for complementary guidance on system design to maximise the energy performance benefits of regulated products.

Question 8

Do you agree to include a definition of electric visibly glowing radiant portable local space heating products?

Response: Yes.

CIBSE supports creation of this separate category where operational characteristics differ materially from other electric heating products. These products have different performance characteristics from their fixed equivalents (e.g., different installation

orientations, different thermal environments) and benefit from a dedicated set of performance requirements.

Question 9

Do you have views on the proposal to separate ecodesign performance of towel rails from fixed electric local space heaters?

Response: Yes.

CIBSE supports separate treatment of towel rails.

Towel rails frequently serve mixed functions including comfort heating, towel drying, moisture management, and intermittent operation. Their usage patterns differ from primary fixed space heating products and therefore justify separate assessment criteria.

Question 10

Do you have views on the proposal to categorise towel rails by power output (≤60 W, >60 W to ≤250 W, and >250 W)?

Response: Yes.

CIBSE broadly supports the three-tier categorisation by heat output where this reflects differing use patterns and technical capability.

DESNZ should ensure thresholds remain evidence-based and periodically reviewed as products evolve.

We note that the lowest tier (≤60 W) is subject to a specific time-limitation control requirement (Q41), which CIBSE also supports as an effective measure to avoid unnecessary continuous operation of very low-output products.

Question 11

Do you have views on the proposed increased scope set at 50 kW or lower for domestic local space heating products?

Response: Yes.

CIBSE supports the proposal where it improves consistency and closes potential regulatory gaps. From a building services perspective, CIBSE notes that 50 kW is well above the output of any single domestic local space heater in typical use, providing adequate headroom while ensuring no products are inadvertently excluded from scope.

Question 12

Do you have views on the proposed increased scope set at 300 kW or lower for commercial local space heating products?

Response: Yes.

CIBSE supports the proposal in principle.

Larger commercial systems can contribute significantly to energy demand and emissions, and therefore appropriate efficiency regulation is justified.

CIBSE would welcome guidance from Government on how products at the upper end of this range interact with other regulatory frameworks (e.g., building regulation compliance) to avoid any double-counting or conflicting requirements.

Question 13

Do you feel the product categories proposed accurately reflect the distribution of products sold on the GB market? How do you view this changing in the next 5 to 10 years?

Response: Broadly yes.

The proposed categories appear generally representative of the current market. However, CIBSE recommends continued market review to ensure emerging hybrid and smart-controlled products are appropriately captured.

Looking ahead 5 to 10 years, CIBSE anticipates the following trends that may affect product category relevance:

- Growth in infrared panel heaters: Flat-panel infrared electric heaters are increasingly specified in low-energy buildings. Their performance characteristics (radiant rather than convective heat transfer) differ from conventional electric fixed heaters and may benefit from a dedicated sub-category.
- Smart and networked heating products: The proliferation of products that integrate with home energy management systems, heat pumps, and demand-side response schemes will increase. The controls framework proposed in this consultation is a good foundation, but categories may need to evolve to reflect networked product architectures.
- Heat pump integration: As heat pump adoption increases, there may be growing use of electric supplementary heaters as 'top-up' products during peak demand. The interaction of such products with heat pump systems is relevant to whole-system efficiency.

CIBSE recommends that the review clause (proposed for by May 2031) include an assessment of whether product categories remain appropriate considering market evolution.

Question 14

Do you believe that the proposed regulatory changes could restrict/affect the ability of manufacturers to bring multi-functional products to market?

Response: Not sure, some risks.

CIBSE acknowledges that the breadth of scope in this consultation creates some risk of multi-functional products falling across category boundaries or being inadvertently captured by requirements designed for single-function products.

Products of particular note include combination fan heater and air purifier products, and heated furniture items marketed for comfort rather than primary space heating.

CIBSE recommends that the Government publish clear guidance (alongside the final SI) on how manufacturers of multi-functional products should determine the appropriate product category and demonstrate compliance. Engagement with trade associations representing manufacturers of such products prior to finalisation of the SI would be beneficial.

Question 15

Do you have a view on the testing methodologies currently used to calculate parameters used in seasonal space heating efficiency calculations?

Response: Yes.

CIBSE supports the move to align SSHE calculation methodology with the EU approach, as this facilitates harmonised testing and product comparability across markets. The current divergence between GB and EU methodology (particularly regarding the Primary Energy Factor and formula structure) has created unnecessary complexity for manufacturers placing products on both markets.

From a technical standpoint, CIBSE notes that the SSHE metric, while useful, reflects a single-product assessment and does not capture whole-system efficiency. Building services engineers are concerned that improving individual product SSHE while neglecting system-level efficiency (e.g., controls integration, thermal zoning, building fabric) will not deliver the expected real-world energy savings.

CIBSE would welcome engagement with Government on whether there is scope to develop complementary system-level guidance or metrics that sit alongside product-level MEPS.

Question 16

What innovation do you envisage in the local space heating product area will be driven by this proposed regulatory change?

Response:

Likely innovation areas include:

- smarter controls and interoperability.
- controls integration.
- occupancy-responsive heating.
- improved standby power management.

- lower-emission combustion technologies.
- improved repairability and modularity.
- integration with smart grids and demand flexibility.
- improved efficiency in electric fixed heaters.
- improved user interfaces and consumer information.

CIBSE cautions that the pace of regulatory change should be considered alongside market readiness. A short lead-in period between consultation and implementation could limit manufacturers' ability to innovate and may result in market disruption.

Question 17

Do you have any views on the proposal to include designated standards?

Response: Yes.

CIBSE supports use of designated standards (GB equivalents of EU harmonised standards) where they improve consistency and confidence in compliance.

CIBSE recommends that the Government ensure timely publication and updating of designated standards to avoid a prolonged period in which only transitional methods are available. Delays in publishing designated standards can create uncertainty for manufacturers and enforcement authorities.

CIBSE, as a technical body, would welcome the opportunity to contribute to the development or review of relevant designated standards, particularly those relating to performance assessment.

Question 18

Do you have any views on the validity and current day relevance of the 'transitional' testing methods?

Response: CIBSE has some concerns.

The transitional methods referenced in Annex F draw on a range of EN standards, some of which date back to the late 1990s and early 2000s (e.g., EN 1:1998, EN 613:2000, EN 60675:1995). While these standards remain technically valid for their primary purposes, CIBSE recommends that Government assess whether any transitional methods are significantly out of step with current product technologies.

As control technologies evolve rapidly (particularly for networked and self-learning controls), CIBSE recommends a commitment to reviewing transitional methods on a regular cycle, with a clear pathway to replacement by updated designated standards.

CIBSE recommends that transitional methods should only remain in place where technically necessary and should be phased out once updated harmonised methodologies are fully established.

CIBSE would support a technical working group involving industry, standards bodies, and building services engineering practitioners to review the currency and adequacy of transitional methods.

Question 19

Do you agree with lowering the Primary Energy Factor for electricity to 1.9?

Response: Yes.

CIBSE supports the proposed reduction.

The change better reflects continued electricity grid decarbonisation and provides a more representative comparison between electric and fossil fuel systems. The consultation document notes this change is intended to better reflect the efficiency of electric heat generation relative to fossil fuel use. The factor should continue to be periodically reviewed.

Questions 20–34

Views on proposed minimum performance thresholds for individual product categories.

Response: Broadly yes.

CIBSE supports the principle of progressively tightening minimum energy performance standards where evidence demonstrates technical feasibility and lifecycle benefits.

The consultation evidence suggests that many products already exceed proposed thresholds and that regulatory intervention would remove poorer-performing products while preserving consumer choice.

CIBSE particularly supports:

- reducing inefficient products entering the market.
- aligning with updated EU ecodesign provisions.
- improved control effectiveness.
- improved standby and low-power performance.

However, implementation should continue to consider:

- proportionality for niche products.
- affordability impacts for vulnerable consumers.
- practical retrofit constraints.
- avoidance of unintended consequences such as increased use of supplementary portable heating.

CIBSE does not wish to comment individually on each numerical threshold value.

Question 35

Do you have a view on whether requirements should apply at 'placed on market' or 'coming into service'?

Response:

CIBSE considers “placed on the market” generally provides greater clarity and enforceability for manufacturers and supply chains.

However, transitional arrangements should minimise waste and avoid unnecessary disposal of compliant stock.

Question 36

Aside from compliance costs, do you expect additional costs from aligning GB regulatory standards with the EU?

Response:

CIBSE acknowledges that there may be some transitional costs associated with aligning GB standards with EU Regulation 2024/1103, particularly for manufacturers who have already invested in compliance with the current EU regulation and now need to adapt documentation, labelling, and testing records for a GB-specific SI.

However, CIBSE's view is that alignment is broadly cost reducing in the medium to long term, as it allows manufacturers to operate under a single technical framework across both markets, reducing duplicate testing and documentation costs.

Question 37

Q37: Do you have views on the new proposed nitrogen oxide limits?

Response: Yes.

The proposed reduction in maximum NOx emissions from 130 to 120 mg/kWh input for closed fronted, open fronted, balanced flue, flueless, and open to chimney heaters, and from 200 to 180 mg/kWh input for luminous and tube heaters, reflects improved combustion technology available in the market.

From a building services and indoor air quality perspective, NOx emissions from gas and liquid fuel heaters are a significant concern, particularly for flueless and open-fronted products where combustion products are released directly into the heated space. CIBSE supports the proposed reductions and encourages Government to consider further tightening of NOx limits, particularly for flueless heaters, in line with evolving indoor air quality standards and public health evidence.

CIBSE notes that the interaction between NOx emissions from local space heaters and indoor air quality should be addressed in product information and installation guidance, complementing the regulatory limits.

Question 38

Do you foresee any technical feasibility issues with complying with the proposed nitrogen oxide emission limits?

Response: No response.

CIBSE recognises this is primarily a manufacturer and product testing matter.

Question 39

Do you have views on the categorisation of control functions which can be provided to local space heaters?

Response:

CIBSE recommends that the definitions of control categories be reviewed as part of the proposed 2031 review to ensure they remain aligned with evolving control technology, including AI-driven heating optimisation and integration with heat pump systems.

Question 40

Do you have views on the proposal to require electronic heat charge control with temperature feedback and fan-assisted heat output for electric storage heaters?

Response: Yes.

CIBSE supports improved charge control and temperature feedback for storage heaters. Improved control responsiveness can reduce overheating, improve occupant comfort, and better align operation with variable electricity supply and smart tariff structures.

CIBSE supports this requirement and recommends that installation guidance be updated to reflect best practice for the commissioning and use of compliant storage heaters.

Question 41

Do you have views on the proposed time limitation of towel rails of ≤60 W heat output?

Response: Broadly yes.

CIBSE supports measures intended to reduce unnecessary continuous operation.

However, flexibility may be needed for specialist applications where continuous low-level operation supports moisture management or hygiene objectives.

Question 42

Do you have views on the proposed requirement for all local space heating products to require control to provide heat output?

Response: Yes.

CIBSE strongly supports this proposal. Mandatory controls are an essential component of energy efficiency and consumer protection. It closes the long-standing loophole that has allowed uncontrolled products to enter the market.

From a building services engineering perspective, the provision of control is not merely a 'nice to have' — it is a prerequisite for efficient and safe operation of heating products. CIBSE's guidance consistently emphasises that heating systems should be capable of being turned off and modulated in response to occupancy and thermal comfort needs.

CIBSE supports this requirement and recommends that it be accompanied by clear guidance for consumers and installers on the types of control that are compatible with different product categories.

Question 43

Do you agree with the proposed power consumption thresholds in off, idle, and standby modes?

Response: Yes.

CIBSE supports tighter standby and low-power requirements. Parasitic energy use can be significant in aggregating across the building stock, particularly as connected and smart products become more widespread.

The proposed maximum power consumption thresholds for off mode (0.3 W), standby mode (0.5–3 W depending on functionality), and idle mode (1–3 W depending on network requirements) are consistent with the EU approach and represent technically achievable targets for modern products.

CIBSE notes that the higher standby allowance for products with wireless communication between heat generator and control (3 W) is pragmatic, given the need to maintain a wireless receiver in active mode.

Question 44

Do you have views on how the proposed requirement to provide spare parts may impact the amount of raw materials used to produce local space heating products?

Response:

CIBSE considers increased spare parts provision is likely to reduce whole-life material consumption overall by extending product lifetimes and reducing premature replacement.

CIBSE supports right-to-repair measures as consistent with circular economy principles and net zero objectives. The embodied carbon associated with manufacturing new heating products is not insignificant, and extending product lifetimes through repair is a valuable contribution to reducing whole-life carbon emissions.

Some increase in inventory requirements may occur, but this is likely outweighed by lifecycle resource savings.

CIBSE recommends that future product carbon footprint assessments (if developed for this sector) include embodied carbon considerations alongside operational energy performance.

Question 45

Do you have views on the proposed requirement for manufacturers to make available spare parts for local space heating products?

Response: Yes.

CIBSE supports the requirement for manufacturers to make available the spare parts listed in Annex E. The list covers the components most commonly subject to failure (controls, circuit boards, sensors, heating elements, fans, and switches), which are the parts most likely to be needed for repair.

CIBSE notes that the practical effectiveness of this measure will depend on the availability of approved installers trained to carry out repairs, and on consumer awareness of the right to repair. CIBSE recommends that Government consider complementary measures to promote repair, such as consumer information campaigns and support for training programmes for heating installers.

Question 46

Do you have views on the proposed timescale of 10 working days to ship spare parts?

Response: Broadly yes.

CIBSE considers the proposed timeframe reasonable in principle.

CIBSE notes that for heating products in occupied buildings, extended periods without heating can cause significant discomfort, particularly for vulnerable occupants. For critical components (particularly controls and heating elements for primary heating products), CIBSE would encourage manufacturers to aim for faster fulfilment where possible.

CIBSE recommends that the Government monitor spare part availability and shipping times as part of market surveillance activities following implementation.

Question 47

Do you agree with the proposed requirement for manufacturers to provide repair information to professional repairers contingent on suitability checks?

Response: Yes.

CIBSE strongly supports the requirement for manufacturers to provide repair information to professional repairers, subject to demonstration of sufficient technical competence and appropriate insurance. This is an important safeguard, particularly for gas-powered local space heaters, where unsafe repair by unqualified individuals poses a serious risk to life.

The requirement for Gas Safe registration as a condition of access to repair information for gas appliances is appropriate and consistent with existing legal requirements for gas work in GB. CIBSE recommends that equivalent competency requirements be specified for electric heater repair information.

CIBSE supports the underlying principle that repair information should be accessible to qualified professionals while being protected from misuse by unqualified individuals.

Question 48

Do you have views on how the suitability check of a professional repairer should be conducted?

Response:

CIBSE recommends that suitability checks for professional repairers be based on recognised competency frameworks already established in the industry, rather than creating new bespoke assessment processes. Relevant frameworks include:

- Gas Safe Register registration for gas-powered products
- NICEIC, NAPIT, or ELECSA registration for electrical products
- Relevant City & Guilds, EAL, or BPEC qualifications for heating engineers
- Membership of relevant professional bodies (e.g., CIBSE) where applicable

CIBSE recommends that the final SI or accompanying guidance specify the competency requirements for each product category, and that the process for manufacturers to verify credentials be standardised to reduce administrative burden.

CIBSE would be willing to work with Government and industry to develop a clear framework for repairer competency requirements.

Question 49

Do you have views on the proposed timelines for registering a professional repairer or providing repair information?

Response: Yes.

The proposed timelines (5 working days) for manufacturers to evaluate and approve or reject a repairer application, and one working day for repair information to be provided following approval, are reasonable and proportionate.

CIBSE notes that a 5-day evaluation period is generous relative to the urgency of some repair situations (e.g., a heating product failure in winter in a vulnerable household). CIBSE recommends that manufacturers be encouraged to process applications more quickly where possible, and that guidance indicates that applications should be treated as a priority during wintry weather periods.

The one working day information provision timeline following approval is appropriate and will facilitate timely repair.

Question 50

What impact do you feel that these proposals will have on small and medium businesses?

Response:

CIBSE recognises that SMEs may experience proportionately greater compliance burdens.

Government should therefore provide:

- clear guidance.
- reasonable transition periods.
- simple compliance processes.
- alignment with existing EU requirements where possible.

CIBSE recommends that the Government engage specifically with SME trade associations during the implementation phase to ensure SME impacts are understood and appropriate support is provided.

Question 51

Do you have views on the proposed inclusion of a provision banning the use of circumvention measures?

Response: Yes.

CIBSE strongly supports the inclusion of an explicit ban on circumvention measures, including firmware and software modifications that cause products to perform better under test conditions than under normal operation. This is essential to the integrity of the ecodesign framework.

As noted in the consultation, circumvention has the effect of understating a product's real-world energy consumption, leading to higher bills and emissions than predicted by compliance testing. From a building services engineering perspective, circumvention

also undermines the reliability of energy performance calculations used in building design and compliance assessments. Declared performance should accurately reflect real operational behaviour throughout product life.

Question 52

Do you have views on the proposed mandatory phrasing for products requiring separate related controls?

Response: No response

Question 53

Do you have views on the proposed mandatory phrasing for flueless and open to chimney local space heaters?

Response: Yes.

CIBSE supports the retention of mandatory phrasing 'This product is not suitable for primary heating purposes' for flueless and open to chimney local space heaters. These products release combustion products directly into the heated space and should not be used as the sole source of space heating in occupied rooms.

From a building services and indoor air quality perspective, the inappropriate use of flueless heaters as primary heating is a significant risk, particularly in well-insulated buildings where ventilation may be limited. Clear mandatory phrasing on packaging, in the manual, and on manufacturer websites is an important safeguard.

CIBSE recommends that the mandatory phrasing be accompanied by guidance on safe ventilation requirements for flueless heaters, and that this information be required in the product installation and user instructions.

Question 54

In the absence of regulatory changes in GB, to what extent would industry voluntarily observe EU regulation?

Response:

CIBSE's view is that, in the absence of GB regulatory changes, a proportion of manufacturers supplying both GB and EU markets would continue to produce products compliant with EU Regulation 2024/1103 for commercial reasons — particularly large manufacturers for whom maintaining separate GB and EU product lines would be costly.

However, voluntary compliance would be inconsistent and unenforceable. Products from manufacturers serving primarily the domestic GB market, or from importers sourcing from outside the EU, might not voluntarily meet EU standards. This would create an unlevel playing field and allow less efficient products to enter the GB market.

CIBSE therefore strongly supports regulatory action rather than reliance on voluntary industry compliance. Regulation provides a level playing field, consumer protection, and a basis for market surveillance and enforcement.

Question 55

Do you have views on the proposed date for review of local space heating regulations (by May 2031)?

Response: Yes.

CIBSE supports periodic review of the regulations.

CIBSE recommends that the review scope explicitly include: reassessment of the Primary Energy Factor (CC) in light of updated grid decarbonisation data; consideration of whether product categories remain appropriate for evolving market technologies (including infrared panels and smart heaters); review of SSHE thresholds in light of technological progress; and assessment of the effectiveness of right-to-repair provisions.

CIBSE would welcome the opportunity to contribute to the review process, drawing on the expertise of our members in building services, engineering, and energy management.

Question 56

Do you have any views on the proposals to adopt the text amended by the EU?

Response: Yes.

CIBSE broadly supports alignment with updated EU ecodesign provisions where this:

- reduces market fragmentation.
- simplifies compliance.
- supports consistent product standards.
- avoids regulatory divergence.
- maintains consumer protection and energy performance outcomes.

Question 57

Do you have views on the extent to which this policy may affect people with protected characteristics under the 2010 Equality Act?

Response:

CIBSE considers the proposals to be broadly positive overall because improved energy efficiency and controllability may reduce energy costs and improve thermal comfort.

However, Government should consider impacts on:

- low-income households.
- older people.
- disabled occupants.
- Households are more vulnerable to fuel poverty.

Any increase in upfront product costs should be carefully monitored to avoid disproportionate impacts on vulnerable groups.

CIBSE recommends that Government consider support schemes (e.g., through the Warm Homes Discount or equivalent) to help older and low-income households access compliant, efficient products. CIBSE recommends that accessible design be considered in guidance accompanying the SI.

Over time, improved MEPS will reduce the energy cost of operating heating products, which is beneficial. CIBSE recommends that the Government assess the distributional impacts of any compliance cost pass-through to consumers.

Concluding Remarks

CIBSE supports the overall direction of the proposed ecodesign regulations and considers that the proposals should contribute positively to:

- reducing operational energy demand.
- supporting UK net zero objectives.
- improving product performance.
- reducing lifecycle environmental impacts.
- improving controllability and user outcomes.
- supporting circular economy objectives.

CIBSE particularly supports:

- tighter efficiency standards.
- mandatory controls.
- improved standby performance.
- right-to-repair measures.
- prohibition of circumvention practices.
- continued alignment with EU ecodesign provisions.

CIBSE recommends that implementation remains proportionate, evidence-based, and subject to periodic review as technologies and building energy systems continue to evolve.