

Vaillant Group

Response to Consultant Report on Cost-benefit assessment of Gas quality harmonization in the EU

Public consultation

1. Do you agree with the high-level conclusions of this report?

Yes, it's a extensive summary of the current situation for that, we agree on this consultant report fully.

2. As a manufacturer do you maintain an inventory of installed appliances?

The inventory of installed appliances is offering a high potential of efficiency improvement. It's in our interest to replace the appliances regularly by higher efficient appliances. The efficiency and emission targets can't be met by only conversion of appliance. Far from it the number of exchange have to be increased.

4. Do you manufacture appliances that can operate over the full EASEE-gas specification without loss of efficiency or increased of emissions?

The majority of the of the latest mass-produced boiler cannot operate safely over the full EASEE-gas Wobbe-range. There will be an increase of the emissions and in some applications a loss of efficiency. New technical solutions are available but they aren't suitable for mass-produced boilers. A considerable reduction of the EASEE-gas Wobbe-range could solve the problems in a proper way.

5. Do you have evidence of damage or failures caused by appliance operating on gas that is not compliant with the local gas quality specification?

Our experience in damages and failures caused by appliances operating on gas was taken in account in the gasqual project.

6. Would you support the adoption of the proposed EUROMOT gas quality specification but not based on the EASEE-gas specification.

With regard to establishing mass-produced mCHP-appliances in the market we support the EUROMOT requirements especially the limitation of the Methanzahl but not based on the proposed EASEE-gas Wobbe-range. The EASEE-gas Wobbe specification must be much smaller.

Yours faithfully

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