

April 10, 2025

To the decision makers of Europe

**Nordic Joint Statement: In Defense of Innovation, Affordability, and Common Sense in the Ecodesign Regulation**

As representatives of the Nordic wood stove industry – spanning Denmark, Sweden, Norway, and Finland – we write to express our growing alarm over the current draft revision of the Ecodesign Regulation for local space heaters. What is proposed is not merely a regulatory update; it is a disruptive shift that threatens to dismantle an entire industry, undermine years of technological progress, and jeopardize the energy security of millions of European households.

Let us be clear: we share the Commission's ambition for cleaner air, lower emissions, and smarter energy systems. Our region has long led the way in innovation, setting the standard for high-efficiency, low-emission stoves. Through responsible regulation and investment, modern Nordic stoves today emit a fraction of what older models do – with documented particle reductions of up to 79%. This progress did not happen by accident. It is the result of serious policy, science-based development, and trust between regulators and industry.

That is precisely why this proposal is so deeply concerning. Rather than build upon the momentum of progress, the draft risks halting it entirely. It introduces unvalidated testing methods with no real-world foundation, imposes extreme emission thresholds without empirical backing, and mandates technologies that will exclude nearly all currently certified products from the market – regardless of their environmental performance.

If adopted, this regulation would not accelerate the green transition. It would derail it.

It would push responsible manufacturers out of the market, especially the SMEs that form the backbone of the European stove industry. It would remove affordable, renewable heating options from citizens – particularly in rural and off-grid areas – forcing them toward more polluting, outdated, or even illegal alternatives. And it would do so while violating the Commission's own strategic compass: contradicting both the *EU Competitiveness Agenda* and the principle of *affordable, secure, and sustainable energy* as outlined in the Green Deal and REPowerEU.

The consequences are not hypothetical. They are predictable – and preventable.

This is not a battle between innovation and regulation. It is a question of whether the EU will choose pragmatic, science-based policy that works with industry, or top-down mandates that

undermine it. No one benefits from a regulation that outpaces the capacity for compliance, ignores stakeholder input, and alienates the very actors who have delivered environmental gains on the ground.

We therefore urge the European Commission to reconsider its approach and:

1. Withdraw the current draft and initiate a transparent, inclusive revision process grounded in validated methods and real-world data.
2. Ensure technological neutrality, allowing multiple pathways to compliance rather than mandating narrow solutions that serve only a few.
3. Align the regulation with the EU's broader priorities: competitiveness, affordability, crisis-resilient heating solution, and social equity. Consider wood-burning as a valuable energy source to relieve pressure on the electricity grid during peak demand, thereby freeing up electricity for more critical uses – such as reducing fossil fuel consumption in the transport and industrial sectors.
4. Extend any transition period significantly, recognizing the scale of testing and redesign work required for meaningful compliance.
5. Recognize modern wood stoves as part of the solution, not the problem – as vital tools in a balanced, low-carbon heating mix.

We stand ready to collaborate. But collaboration must be founded on mutual respect and sound reasoning. There is still time to turn this proposal into a success story – one where environmental ambition and industrial realism go hand in hand.

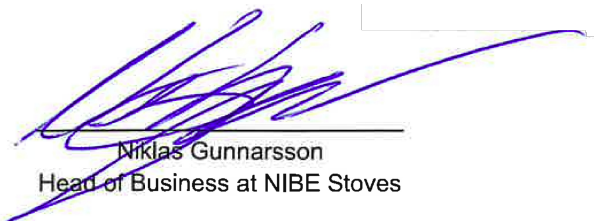
Yours sincerely,



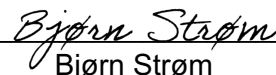
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