**Liquid Gas Europe’s written comments**  
**to the Discussion Document for 1\textsuperscript{st} WG 4 meeting**

**NOx emission requirements for appliances running on LPG**

The current Ecodesign Regulation sets a single NOx emission level for all gaseous fuels, i.e. for natural gas and LPG. LPG, which is composed of butane, propane or a mix thereof, is predominantly used in areas that are outside the natural gas grid, on appliances that generally are the same as those running on natural gas. Despite their similarities, LPG and natural gas have different physical characteristics, which means that a heating appliance running on butane or propane generally emits slightly more NOx than its natural gas counterpart.

For that reason, conversion factors of 1.2 (propane) and 1.3 (butane) have been applied for many years in the relevant EN standards. To close the discrepancy between the current Ecodesign Regulation and the relevant EN standards, Liquid Gas Europe supports the proposal to introduce specific NOx emissions for third-family gases into the Ecodesign, reflecting the 1.2 and 1.3 factors. This is indeed in line with the most recent proposal of experts in the relevant EN 15502-1 standard.

Being a clean burning fuel and having much lower CO\textsubscript{2} emissions than most energy options available in rural areas, LPG has a role to play in the decarbonisation of the heating sector. Simply switching from a conventional coal or oil boiler to a condensing LPG appliance can reduce CO\textsubscript{2} emissions by 50\% or 25\%, respectively, without compromising on the house’s thermal comfort. At the same time, LPG boilers emit 80-99\% less particulate matter than boilers relying on solid fuels. These benefits further increase when LPG is used in cutting edge appliances, such as micro-CHP, or in combination with renewable technologies, such as solar panels and gas heat pumps. Last, but not least, renewable LPG, which has recently been launched into the market, can further increase these benefits: it has up to 80\% reduced CO\textsubscript{2} footprint compared to its conventional equivalent.

**Liquid Gas Europe supports the application of conversion factors: for G30 gases a factor 1.3 on the current NOx-limit (for natural gas) and for G31-gases a factor 1.2.**
Liquid Gas Europe

LPG - The smart alternative, everywhere you need it

Liquid Gas Europe’s membership is composed by national LPG associations, the main European LPG suppliers, distributors and equipment manufacturers. With the support of its working groups of industry experts, Liquid Gas Europe is actively involved in concrete initiatives and programs to ensure the sustainable, safe and efficient development of LPG in Europe.

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