

REGULATORY IMPACT ASSESSMENT (RIA)

(Article 5 of the Prime Ministerial Decree 15 September 2017, No. 169)

Measure: Draft regulation for updating Decree No 186 of the Minister for the Environment and the Protection of Land and Sea of 7 November 2017, adopted pursuant to Article 290(4) of Legislative Decree No 152 of 3 April 2006.

Competent administration: Ministry of the Environment and Energy Security

Contact at the competent administration: Legislative Office

SUMMARY AND MAIN CONCLUSIONS OF THE RIA

The purpose of this measure is to update Decree No 186 of the Minister for the Environment and the Protection of Land and Sea of 7 November 2017, adopted pursuant to Article 290(4) of Legislative Decree No 152 of 3 April 2006, concerning the ‘Regulation laying down the requirements, procedures and competences for the issue of a certification for heat generators fuelled by solid combustible biomass’.

The update does not alter the substantive rules of the Regulation, but adds new types of certification in order to adapt the regulatory framework to technological developments. Specifically, the measure introduces new emission performance classes: the 6-star class for both boilers and stoves, with the exception of open fireplaces, and the 7-star class for boilers only. Furthermore, the measure under consideration revises the 5-star rating in terms of CO emissions and efficiency, for both stoves and boilers.

The need for this update stems from the complex European legal proceedings brought against Italy due to several regions exceeding the air quality limit values set by Directive 2008/50/EC for certain pollutants, such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO₂). In fact, four separate infringement proceedings are currently underway against the Italian State, two of which have already resulted in a ruling by the European Court of Justice finding Italy to be in breach of its obligations, with the risk that Italy may be required to pay substantial fines should it be found in breach again.

This already particularly critical situation is further compounded by the adoption of the new European directive on air quality, which sets out stricter limit values to be met by 2030.

The domestic heating sector – and, in particular, the combustion of woody biomass – contributes significantly, on a par with other sectors such as transport and agriculture, to emissions of primary particulate matter (PM), which, once released into the air, cause air pollution.

Although the regions are the competent authorities for the assessment and management of air quality, the State has for many years been supporting regional initiatives through funding programmes and, most recently, through the adoption of the National Action Plan for the Improvement of Air Quality 2025–2027, which aims to significantly reduce pollutant emissions across all sectors.

One of the actions provided for in the above-mentioned national action plan on air quality is the update of Ministerial Decree No 186 of 2017, with the aim of exploiting the best technologies currently available and providing an incentive for the introduction on the market of increasingly advanced technologies, taking into account technological developments in the field of biomass heat generators, both established and under development. Indeed, several years after the decree came

into force, the regulatory, technological and environmental landscape has evolved, and the classification established in 2017 has now become firmly established in the market. The technology sector has made significant progress in reducing emissions.

The proposed amendments are justified by the outcome of the technical discussions between the Ministry of the Environment and Energy Security and the authorities responsible for the matters governed by the regulation. The scheme itself also arose following informal discussions with the Italian Association for Agroforestry Energy (AIEL), which represents manufacturers of domestic biomass systems and possesses significant technical expertise regarding the technologies covered by the decree.

The update of Ministerial Decree No 186/2017 also aims to ensure a uniform and up-to-date reference framework for the regions, avoiding regulatory fragmentation resulting from the adoption of individual regional measures.

1. CONTEXT AND PROBLEMS TO BE ADDRESSED

The context of the update of Ministerial Decree No 186 of 2017, adopted pursuant to Article 290(4) of Legislative Decree No 152 of 3 April 2006, concerning the ‘Regulation laying down the requirements, procedures and competences for the issue of a certification for heat generators fuelled by solid combustible biomass’, concerns air quality.

The need for the update is justified by the complex European litigation brought against Italy for exceeding the PM₁₀, PM_{2.5} and NO₂ limits. Italy is currently subject to four infringement proceedings. Infringement proceeding No 2014/2147, concerning exceedances of the PM₁₀ limit values, relates to areas in the regions of Emilia-Romagna, Lombardy, Piedmont, Veneto, Apulia, Tuscany, Campania and Lazio; proceeding No 2015/2043 concerning nitrogen dioxide (NO₂) affects areas in the regions of Lazio, Liguria, Lombardy, Piedmont, Sicily and Tuscany. Both proceedings resulted in the judgement of the European Court of Justice in 2020 for PM₁₀ and 2022 for NO₂, respectively. Furthermore, in March 2024, the proceedings concerning PM₁₀ advanced to the stage of a letter of formal notice pursuant to Article 260 of the TFEU.

In addition to these proceedings, there is infringement proceeding 2020/2299, concerning non-compliance with the annual limit value for PM_{2.5}, which is currently at the stage of issuing a letter of formal notice and concerns areas in the Lombardy and Veneto regions, as well as the recent letter of formal notice 2025/2187 concerning the exceeding of NO₂ limit values in one area of the Campania region and one in the Sicily region.

Furthermore, in October 2025, the new Air Quality Directive (Directive 2024/2881/EU) was adopted; effective from 2030, it halves the air quality limit values for the pollutants that – as described above – are currently exceeding the limits.

Although the regions are the competent authorities for the assessment and management of air quality, only a national effort, in conjunction with regional efforts, is considered capable of tackling the complex issue of air pollution, which, by its very nature, transcends regional boundaries. This approach is necessary in order to speed up the process of resolving the complex dispute with the European Commission regarding air quality, which could result, in the event of a further ruling against Italy, in the country having to pay a very high fine. This clearly defined institutional and strategic framework therefore provides for national support, alongside the implementation of regional air quality plans, through the adoption of measures targeting sectors in which the regions face greater difficulties in taking action.

In order to speed up the process of meeting the current limit values and to help resolve infringement proceedings relating to air quality, the National Action Plan for Improving Air Quality 2025–2027 has been adopted. This Plan, drawn up by the Steering Committee established pursuant to Article 14 of Decree-Law No 131 of 16 September 2024, approved by a resolution of the Council of Ministers on 20 June 2025, following consultation with the Unified Conference and published in the Official Gazette on 2 August 2025, contains a series of national initiatives which, in conjunction with the regional plans, aim to substantially reduce pollutant emissions across all sectors.

This Action Plan is structured around five areas of intervention: one cross-cutting, three thematic and one complementary. For each area of intervention, specific operational measures have been identified, forming part of a single, comprehensive strategy. In particular, the amendment to the said Decree 186/2017 is one of the implementing measures (Measure A) of Action 1, 'Reduction of pollutant emissions from biomass heat generators', which falls within Intervention Area 4 'Domestic heating', developed with the aim of encouraging the replacement of obsolete installed heat generators – which account for the majority of primary particulate matter emissions – through the introduction of new, higher-performance environmental classes and new, more stringent emission limits.

The updating of the regulation in question, therefore, is one of the actions by the Plan in the field of civil heating intervention, aimed at reducing emissions of pollutants from the combustion of woody biomass for civil use, through the use and development of the best available technologies.

In compliance with the national reference legislation, the individual regions have played an active role in the implementation of policies aimed at improving air quality, pursuing specific regulatory developments that introduce stricter values than those established in the national legislation on biomass heat generators. In particular, through air quality plans, many regional administrations limit the installation and use of generators belonging to lower environmental classes, especially in areas subject to exceedances of air quality limit values, favouring the use of high emission performance appliances, according to the classification of Ministerial Decree No 186 of 2017. The introduction of these measures – including the requirement to install generators in the highest environmental classes (4 or 5 stars) and the ban on the use of less efficient appliances during certain periods of the year – is aimed at reducing pollutant emissions, particularly particulate matter, as well as at the gradual replacement of existing plant with more efficient technologies that have a lower impact on air quality. In some cases, the regions have also introduced programmes for the phased decommissioning of obsolete plants, accompanied by incentives or support measures to facilitate their replacement.

Regional action therefore serves to reinforce national legislation by adapting environmental policies to specific regional circumstances and local challenges, particularly in areas most exposed to air pollution.

The introduction of new emission classes for heat generators will, on the one hand, enable regions to incorporate stricter rules on the use of biomass heat generators into their air quality plans and, on the other hand, steer national and regional incentives towards technologies with an ever-lower environmental impact.

Therefore, the update of Ministerial Decree No 186/2017 also aims to ensure a uniform and up-to-date reference framework for the regions, avoiding a fragmentation of the rules by virtue of the introduction of individual regional measures.

In Italy, there are 35 manufacturers of domestic biomass generators, accounting for 27% of European manufacturers, and 19 manufacturers of solid-fuel boilers with a capacity of less than 500 kW, accounting for 25% of European manufacturers. According to data collected and re-processed by AIEL, in Italy in 2024, the installed fleet comprises approximately 8.8 million biomass appliances and boilers (8 883 868 units). Of these, 97% (8 578 644 units) are domestic appliances, and are therefore installed in a space requiring localised heating, whilst the remaining 3% (305 224 units) are boilers, which require a utility room in which to be installed but which can heat entire flats, residential or commercial buildings.

With regard to sales, pellet stoves accounted for an average of 58.7% of sales between 2014 and 2024, whilst in 2024 the share of this segment fell significantly, probably due to the rise in the price of pellets recorded in the two-year period 2022–2023. In 2024, wood-fired generators strengthened their position: wood-fired stoves reached 28.3% of sales, while wood-fired inserts stood at 24%. Both categories, therefore, appear to be growing compared to the average share of the decade in question. Total sales in 2024 amounted to over 173 000 generators, of which 94% were domestic appliances, 5% were boilers and less than 1% were on-site-built storage stoves.

On-site-built storage stoves, manufactured in accordance with the UNI EN 15544 standard, have been included within the scope of the regulation.

These generators are manufactured and assembled on site according to the specific characteristics of each individual property; consequently, each one is a unique piece. The manufacturing characteristics of these products therefore do not allow them to obtain certification, which requires verification of certain criteria that are not present in this type of product (product reproducibility, standardisation of the manufacturing process, and the identification of a single model that has undergone laboratory tests representative of the production run). This effectively resulted in its exclusion from the previous regulation, creating difficulties in the uptake and promotion of this type of generator; however, under real-world conditions, it has been shown to deliver such high environmental and energy performance that it is capable of achieving a high classification such as the 5-star rating. A test carried out by AIEL and Assocosma on a stove manufactured and sized in accordance with UNI EN 15544 has shown that the emission factors obtained, when compared with those reported in the literature, place these appliances amongst the highest-performing and least environmentally impactful on the market (AIEL data).

The manufacture of these appliances is a fine example of Italian craftsmanship. There are 40 manufacturers of stove components, combustion chambers and majolica tiles in Europe; of these, 8 are Italian manufacturers. These generators are built on site by over 140 professional stove-makers registered in Italy (ASSOCOSMA figures).

2. AIMS OF THE INTERVENTION AND RELATED INDICATORS

2.1 General and specific objectives

The update to Ministerial Decree No 186 of 2017 is one of the implementing measures (Measure A) of Action 1 ‘Reduction of pollutant emissions from biomass heat generators’, within Intervention Area 4 ‘Domestic heating’ of the National Action Plan for the Improvement of Air Quality 2025–2027, drawn up by the Steering Committee established pursuant to Article 14 of Decree-Law No 131 of 2024, approved by a resolution of the Council of Ministers on 20 June 2025, following consultation with the Unified Conference, and published in the Official Gazette on 2 August 2025.

The overall objective of the measure under consideration is to contribute to improving air quality levels in order to resolve the infringement proceedings currently pending against Italy in this regard *subiecta materia* (see paragraph 1) and thus, from a teleological perspective, to ensure higher standards of environmental and health protection, whilst encouraging the introduction onto the market of increasingly advanced technologies for domestic heating.

The specific objective, however, taking into account the provisions set out in the said Action Plan, is to set in motion a process of replacing the existing fleet of wood-fuelled biomass heat generators used for domestic heating, which are responsible for the majority of primary particulate matter emissions, towards state-of-the-art systems, by establishing new, higher-performance environmental classes and introducing more stringent emission limits.

2.2 Indicators and reference values

The Regulation introduces amendments and additions to the Regulation implementing Article 290(4) of Legislative Decree No 152 of 3 April 2006, without modifying the indicators described above that will make it possible to verify the achievement of the objectives.

Specifically, the achievement of the objectives of the Regulation may be verified:

- in the short and medium term, by considering the number of certifications issued with respect to the number of types of products on the market, as well as the quality classes assigned with these certifications;
- in the medium term, by considering the introduction, in the air quality remediation plans and relevant implementing mechanisms, and of policies in the field of domestic heating (incentives,

requirements, conditions, etc.) established in accordance with the quality classes assigned with the certifications.

3. INTERVENTION OPTIONS AND PRELIMINARY ASSESSMENT

The ‘do-nothing’ option was assessed negatively as the regulation is one of the implementing measures (Measure A) of Action 1, ‘Reduction of pollutant emissions from biomass heat generators’, within Intervention Area 4, ‘Domestic heating’, of the National Action Plan for the Improvement of Air Quality 2025–2027, drawn up by the Steering Committee established pursuant to Article 14 of Decree-Law No 131 of 16 September 2024, approved by a resolution of the Council of Ministers on 20 June 2025, following consultation with the Unified Conference, and published in the Official Gazette on 2 August 2025. Given that the aforementioned Action Plan was drawn up with the primary aim of resolving the infringement proceedings currently pending against Italy (see paragraph 1), failure to implement even one of the measures set out therein would jeopardise the achievement of that aim. Moreover, the lack of intervention – hence the maintenance in force of the current Ministerial Decree No 186/2017 – would not allow regions (called upon to draw up their own air quality plans and to define appropriate incentive instruments) to provide an adequate legal basis for promoting the improvement of air quality levels through the stimulation of technological change in the field of heat generators for civilian use.

The option of repealing Ministerial Decree No 186/2017 and adopting a new regulation pursuant to Article 290(4) of Legislative Decree No 152 of 2006 was also assessed negatively. This is due to the fact that, also on the basis of the preliminary investigation carried out by the competent Directorate-General of the Ministry of the Environment and Energy Security together with the other competent administrations, regions and trade associations, it was necessary to update only the reference technical legislation and insert new, more efficient classes. In addition, a new category of heaters has been included – on-site-built storage heaters, classified as 5-star – as well as a quick guide to manual heaters.

All amendments to Ministerial Decree No 186/2017 preserve almost entirely the rules contained therein intended to regulate the definitions, the certification procedure, as well as the methods of installation and maintenance of heat generators. The provisions which it was deemed appropriate to retain have, moreover, served as a useful guide to those for whom they were intended throughout the period in which they remained in force. Any changes to these would therefore ultimately revert to established procedures that are widely used by those concerned and in line with technological developments and current air quality objectives.

The option chosen was, therefore, to amend Ministerial Decree No 186 of 2017 only in those parts requiring updating, placing emphasis on those aspects requiring necessary adjustments in line with air quality objectives and technological developments, whilst leaving unchanged the provisions governing those established aspects that are capable of contributing to the achievement of the general and specific objectives of the measure.

Looking at the individual amendments in detail, it can be seen that the decision not to include new, higher-performance classes – which constitutes the key change made to Ministerial Decree No 186 of 2017 – would have led to a mismatch between the legislation and the market, and would have meant that there was no incentive to replace more polluting appliances with low-emission ones. Several years after the decree came into force, the regulatory, technological and environmental landscape has evolved, and the classification established in 2017 has become firmly established in the market. The technology sector has made significant progress in reducing emissions. The introduction of new, higher-performance emission classes for heat generators will, on the one hand, enable the regions to incorporate stricter rules on the use of biomass heat generators into their air quality plans and, on the other hand, steer national and regional incentives towards technologies with an ever-lower environmental impact.

The possibility of introducing classes with different reference values has also been assessed. Specifically, for boilers, two additional classes have been introduced: the 6-star class, which sets limit values that are, to some extent, already achievable by boilers currently on the market; and the 7-star class, which sets values that represent a target to be aimed for in the near future, but which current technology does not yet allow us to achieve. The proposal to introduce a further intermediate class between the two was rejected, given that any additional step required of the technology would not have guaranteed a sufficient increase in ‘efficiency’ in terms of emissions – and, consequently, air quality – to justify its introduction. Similarly, the proposal to introduce a lower-performance Tier 1 that would reduce emissions from the 5-star tier by 30% was rejected, as this reduction was not considered compatible with the air quality improvement objectives set out in the regulation.

The possibility of introducing an additional target class for stoves has also been considered. This option was ruled out in view of the technological limitations inherent in this type of heat generator. These, being smaller in size than boilers, are hampered by the technical impossibility of fitting emission ‘reduction’ devices, and are therefore unable to achieve even more significant reductions in emissions. It was therefore decided to introduce a single 6-star class, which halves the PP (primary particulate matter) levels compared with the current 5-star class.

The amendment to the technical standards resulted in the addition of the ‘updated’ UNI standards for each generator class compared to the previous ones listed in the regulation. At present, in fact, both sets of regulations apply, depending on the type of appliance sold (in terms of its year of manufacture). Newly manufactured appliances comply with the most up-to-date standards, but appliances that have been placed on the market but not yet sold, and for which the certification is still valid, comply with the previous standards.

The regulation of on-site-built storage stoves, in accordance with the UNI EN 15544 standard, will ensure that a fine example of Italian craftsmanship is not excluded; under real-world conditions, this has demonstrated highly effective environmental and energy performance, sufficient to qualify for a high classification such as Class V, but which, given its construction characteristics, is unable to obtain certification.

The inclusion of the quick guide is a proven tool for training users on how to use the generator and is designed to improve the performance of wood-fired generators in the field. The results in the field in the operation of the generator, in fact, are influenced by the type of firewood, the correct method of ignition and refilling, as well as by the regulation of the oxidising air. Failure to introduce this measure would mean that a key element is missing from the information provided to users to help them improve the performance of wood-burning boilers, thereby risking a reduction in the benefits that can be achieved, even where highly efficient appliances are in use.

4. COMPARISON OF THE OPTIONS AND JUSTIFICATION OF THE PREFERRED OPTION

4.1 Economic, social and environmental impact by target group

The regulation does not have any particular impact on the recipients compared to those already indicated above with the regulatory intervention. The specific rules and criteria for the certification of domestic wood-burning biomass appliances remain unchanged; the measure merely introduces new classes, the use of which remains voluntary and is not compulsory for either manufacturers or consumers.

In any case, it is expected to produce a stimulus for the development of increasingly advanced technologies and at the same time the reduced use of generators with low environmental classes. This could lead to fewer emissions of pollutants with a benefit in terms of air quality for the community within a few years.

In terms of impact, every viable option has been carefully assessed from an economic, environmental and social perspective. The non-intervention option would have negative effects in each of these factors. Whilst the expansion of the certification categories does not entail any additional costs for manufacturers should they decide to apply for certification – given that no changes have been made to the testing procedures – failure to adopt the regulation risks undermining the comprehensive process initiated at national level to improve air quality.

This process, which has also been communicated to and closely monitored by the European Commission, includes the adoption of the regulation in question; failure to adopt it could result in the continuation of the infringement proceedings brought against Italy and, in the event of a further ruling by the European Court of Justice, the payment of substantial financial penalties amounting, according to initial estimates by the Prime Minister's Office, to between 120 and 130 million euros per year.

From a social and environmental perspective, the initiative can only have positive effects because, by promoting the adoption of more efficient regional policies in the sector of domestic heating using woody biomass – the main source of air pollution, accounting for over 50% of PM emissions – it will lead to a consequent improvement in air quality and, therefore, *higher health protection standards*. As the regions are responsible for air quality, they have, in fact, already implemented targeted measures over the years – both in terms of bans on the use of more polluting equipment and in terms of incentives for the purchase and use of more efficient appliances – in order to bring pollution levels within the legal limits and, consequently, to address the infringement proceedings that have been initiated. The provision of the measure in question in the Action plan was also agreed with the regions themselves, which have repeatedly expressed the need to update the emission classes in order to enhance the effectiveness of the plans. There is, therefore, reasonable certainty that the measures set out in the Regional Plan will be strengthened as a result of the adoption of this regulation, particularly given that, from 2030, stricter air quality limits imposed by the new Directive (EU) 2024/2881 will come into force.

Failure to act – that is, failing to provide the regions with an adequate legal basis enabling them to promote technological renewal in the sector of heat generators for domestic use – therefore risks undermining the considerable national effort to combat air pollution.

With regard to this course of action, whilst acknowledging the positive environmental and health effects outlined above, as has been explained at length, no direct economic impacts are anticipated for either builders or citizens. The measure aims to prevent the infringement procedure from progressing and, therefore, to avoid any significant economic penalties being imposed on Italy due to prolonged air pollution.

Finally, the option of repealing Ministerial Decree No 186 of 2017 and adopting a new regulation pursuant to Article 290(4) of Legislative Decree No 152 of 2006 could have environmental and health impacts comparable to those of the intervention option, but, as already mentioned, it risks placing an additional burden on operators, who would have to adapt to a different regulatory framework and comply with new procedures.

4.2 Specific impacts

A. Effects on SMEs (SME Test)

The Regulation does not change the effects on micro, small and medium-sized enterprises indicated above with the regulatory intervention. The new categories that have been added do indeed make it possible to highlight the products with the best environmental performance, but they do not alter the established procedures, whilst retaining the option of voluntary rather than mandatory certification.

For operators within the sector, in overall terms, there will be no disadvantages linked to the regulation, since the investment that manufacturers of generators participating in the certification system will be able to dedicate to expanding the supply of generators certified with higher quality

classes (installations which some manufacturers are already selling on the Italian market) will be offset by marketing revenue.

The scope of the regulation includes on-site-built storage stoves, in accordance with standard UNI EN 15544, which falls within the scope of the regulation. The manufacture of these appliances is a fine example of Italian craftsmanship. Its exclusion from the previous regulation has created difficulties in the widespread adoption and promotion of this type of generator, which, under real-world conditions, has been shown to deliver highly effective environmental and energy performance – sufficient to qualify for a high classification such as Class V – but which, given its design characteristics, is unable to obtain certification.

B. Effects on competition

The regulation does not result in negative impacts on market competition, since the voluntary nature of accession to the certification system excludes any possibility of conflict with rules protecting competition and the free movement of products.

In particular, the regulation does not itself introduce any limitation on or foreclosure to the production and marketing of products manufactured by those who do not wish to make use of the certification or of products that will be certified with lower classes.

C. Reporting obligations

The Regulation does not modify the general information burdens indicated above with the regulatory intervention. A requirement is introduced for manufacturers to include, as part of the information material provided with generators, a leaflet on the correct use of the generator. This will ensure that the generators are used to their full potential by encouraging best practice amongst users (use of suitable fuels, correct ignition, etc.).

Other informational burdens are not envisaged, as a result of the regulation, for citizens and enterprises.

D. Compliance with the European Union regulation minimum levels

European law does not contain any specific provisions on the matter covered by the measure in question.

4.3 Justification of the preferred option

The regulation is one of the implementing measures (Measure A) of Action 1, ‘Reduction of pollutant emissions from biomass heat generators’, within Intervention Area 4, ‘Domestic heating’, of the National Action Plan for the Improvement of Air Quality 2025–2027, drawn up by the Steering Committee established pursuant to Article 14 of Decree-Law No 131 of 16 September 2024, approved by a resolution of the Council of Ministers on 20 June 2025, following consultation with the Unified Conference, and published in the Official Gazette on 2 August 2025.

Of the options analysed, the option to amend Ministerial Decree No 186/2017 only in respect of those parts requiring updating was deemed the preferred option, as it allows for a focus on those aspects that need to be adapted in line with air quality objectives and technological developments, whilst leaving the provisions governing those aspects that are now well-established – and capable of contributing to the achievement of the general and specific objectives of the measure – unchanged.

5. METHODS OF IMPLEMENTATION AND MONITORING

5.1 Implementation

No specific measures are provided for at national or regional level to accompany the implementation of this Regulation.

The regulation will take effect primarily through the certification of new heat generators by manufacturers. The market will be stimulated by the need for manufacturers to exploit the best technologies available today and further stimulus will be given by incentives for the introduction of increasingly advanced technologies that will be activated in the coming years.

Regions will have the possibility to introduce stricter rules for the use of biomass heat generators in their air quality plans, and to steer incentives towards technologies with an increasingly reduced environmental impact; therefore, these regulatory instruments will also be the stimulus for a rapid implementation of the Regulation and the certification of new appliances.

5.2 Monitoring

The effects of the measure, in terms of the gradual uptake of low-emission heat generators on the market, can be assessed over the coming years by determining – including through specific requests from the Ministry of the Environment and Energy Security for data from notified bodies and trade associations – the total number of certifications issued for products placed on the market, the quality classes assigned under these certifications, and the appliances sold on the market.

The effects of the intervention, in terms of optimising the remediation policies provided for in the regional air quality plans and the relevant implementing instruments, can also be verified as part of the institutional dialogue between the Ministry of the Environment and Energy Security and the regional and local authorities.

The impacts of the policy, in terms of strengthening the processes of remediation in areas where biomass domestic heating is a major reason why Community air quality limit values are exceeded, can be verified by the Ministry of the Environment and Energy Security in light of pollutant concentration trends which, in the next few years, will be apparent from the assessment of the air quality in those remediation areas (particularly via measurement networks and regional evaluation programmes).

CONSULTATIONS CARRIED OUT DURING THE RIA

The regulation is the result of technical and preparatory consultations between the Ministry of the Environment and Energy Security, the other central government departments with responsibility for the matters covered by the scheme, the regions and the trade associations. A procedural model was therefore adopted which, thanks to its capacity for in-depth analysis and consultation, enabled the identification and assessment of all data and information – whether technical, legal or otherwise – relevant to the project. In connection with the regulation, meetings were also held, in the form of hearings, with the Italian Association for Agroforestry Energy (AIEL) – which represents manufacturers of domestic biomass systems and possesses significant technical expertise regarding the technologies covered by the regulation – and the National Association of Stove Manufacturers (, ASSOCOSMA), in order to obtain, respectively, a more up-to-date overview of market trends and a specific technical overview of on-site heat generators. The requests made by the aforementioned associations were, in general, accepted, with the sole exception of aligning the limit values for heat generators set out in this regulation with the incentive thresholds provided for in Ministerial Decree ‘Conto Termico 3.0’; this is because such a request would not have allowed for the substantial promotion of new technologies, which is the main objective of the measure in question.

All the amendments made to the regulation were widely supported by the regions, which, through their specific comments, helped to strengthen the overall consistency and effectiveness of the text. Observations focused mainly on Annex 1 and drafting operations.

ASSESSMENT PATH

The regulation stemmed from a preliminary investigation carried out by the relevant Directorate-General of the Ministry of the Environment and Energy Security, which was conducted in accordance with a specific procedure agreed between central and regional authorities.

During the work, the regional administrations and the main trade associations of the sector were consulted in order to identify the changes to be made to ensure the resolution of problems that emerged in the first years of application of Ministerial Decree No 186/2017 and to adapt the regulatory framework to technological developments.

The regulation was also subjected to a legal and legislative review by the Legislative Office of the Ministry of the Environment and Energy Security.