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Sent: Thursday, February 21, 2008 1:06 PM

To: TREN ENERGY LABELLING

Cc: GRONROOS-SAIKKALA Ismo (TREN)

Subject: Stakeholder consultation on the revision of Energy Labelling Framework Directive 1992/75/EEC

Importance: High

Dear Sirs,

The Low voltage motor Working Group of CEMEP (European Committee of Manufacturers of Electrical Machines and Power Electronics) agrees that an energy labelling system is a good instrument to develop markets in the direction towards more energy efficient products.

For electric motors exist an own energy labelling system since 1998. In cooperation with the European commission CEMEP developed a Voluntary Agreement for electric motors including a classification / labelling system. This Voluntary Agreement of CEMEP has led to strong market increase of more efficient electric motors in Europe.

Due to many planned international motor regulations IEC (International Electrotechnical Commission) has started a standardisation project for fixing international efficiency classifications in order to avoid different systems and labels worldwide.

In Europe electric motors are in the focus of the EuP-directive. A study for electric motors in Lot 11 develops already some proposals for implementing measures. The planned implementing measures will refer to the classification / labelling system of the new IEC standard.

With reference to the consultation document on the revision energy labelling directive 92/75/EEC, paragraph 5. Policy options considered “ extending labelling to non-household energy using products, such as electric motors..” (Paragraph 3.2 on page 6 and paragraph 5, table 2) there is obviously no need for an additional energy labelling by the directive 92/75/EEC. An additional European labelling will be counterproductive to a worldwide system which is based on an IEC standard and will confuse the market.

The energy labelling directive 92/75/EEC works quite well in the sector of household appliances (B to C market). However, for electric motors (B to B market) the EuP-directive is the better regulation.

Best regards

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