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Sent: Friday, February 22, 2008 1:42 PM

To: TREN ENERGY LABELLING

Subject: Stakeholder Consultation (Revision on Energy Consumption Labelling Directive 92/75/EG)

Dear Ladies and Gentlemen,

Please find here our answers to your questions (point 6 of consultation document)

Question 1 : new legislation should be based on article 95 of EU -Treaty without different national legislation . Different legislation measures for the same product should be avoided.

Question 2 : we clearly prefer a procedure which is easy to understand and to apply.
A customer friendly labeling system integrated into eco-design measures will help the customer to understand different levels of labeling and lead to adequate buying decisions .Boilers and waterheaters should have specific measures based on eco-design measures .

Question 3 : no comment

Question 4 : a uniform european lable is not possible . But national CO2 - labelings should be avoided .

Question 5 : due to different and changing energy prices running cost labeling seems to be impossible .

Question 6 : the comission should evaluate carefully , if products to be installed (no plug / play)
as boilers and waterheaters should be included in the labeling directive.

Question 7 : we suggest a specific scheme for boilers and waterheaters not based on existing schemes.

Best regards.

Reinhold Brauch

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