



EUROPÄISCHER LEIT-VERBAND DER HERSTELLER VON GAS-INFRAROT-HELLSTRAHLERN E.V.
ASSOCIATION EUROPÉENNE PRINCIPALE DES FABRICANTS DE PANNEAUX RADIANTS LUMINEUX À GAZ
EUROPEAN LEADING ASSOCIATION OF LUMINOUS RADIANT GAS HEATERS MANUFACTURERS

European Commission
DG Energy-ENER.DDG1.B.2
Electricity and Gas
Rue de Mot 24-26
B-1049 Bruxelles

Cologne, September 16th, 2011
Dr.B/BB

Re: DG ENER's Public Consultation on the preliminary report on cost-benefit assessment of Gas
Quality Harmonisation in the EU
Statement of the Association Professionnelle Chaleur Decentralisee (<http://www.cer-chauffage.fr>) dated
September 16th, 2011

Dear Sirs,
we refer to the above mentioned statement of CER and would like to inform you that also the European
manufacturers of gas infrared heaters share the concerns expressed by the CER president, Mr. E.
Rerolle, regarding to that matter of major importance for public safety.

1. Elvhis supports the cost benefit analysis and denies the reliability of the technical analysis on our
products.
2. Elvhis suggests a limited gas quality variation that will allow safe operations and preserve effective
efficiency for our appliances.

The test results of the "figawa working group GasQual" on warm air heaters, radiant luminous heaters
and radiant tube heaters being representative for the predominant population of heating appliances of
these technologies in the European market have proven that free variation of gas quality in the supposed
range is unacceptable for a satisfying performance of installed decentralized heaters. (The experimental
data have been made available for CEN / BT / WG 197.)

Please don't hesitate to contact Elvhis again for more detailed information!

Best regards

Dr. N. Burger
ELVHIS
General Secretary