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From: Brendon Grosse

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To: Energy Rating Team; EnergyRating Mailbox; Enquiries

Cc: Maurice@skanos.com.au

Subject: FW: reminder: submissions due 2nd September - proposed changes to energy efficiency regulations for refrigerated cabinets

Many thanks for the reminder Lisa,

We are broadly supportive of the proposed changes, particularly in relation to the inclusion of Storage cabinets under the new MEPs regulation, which certainly will affect our business as it is about 30% of our turnover. We have nothing to fear as under the new guidelines we represent the most efficient Cabinets in the world, especially from Europe.

We feel the option of following the European standards, to be the most sensible option. I would think a vast majority of cabinets imported into this country would, should or will comply to those standards.

Two thing I would like to cover. The matters of compliance, and labelling.

Compliance is simple. We strongly feel that if European certification is provided, that is all that is required by way of testing relating to the standard.

We don't feel it is necessary to physically label the products.

- Most of the storage cabinets sold in this country do not see a showroom floor.
- Most sales are sent direct from the factory to the end user or to site where all packaging is removed and the end user doesn't see it.
- If the end user does see it then it mostly will not be side by side to compare with other products
- We think it is more advisable to require that all electronic Marketing such as eblasts and Websites and brochure's require the label as a tag.

That said, all of our Refrigeration cabinets **are** already physically labelled now, with the current new European labelling. If physical labelling is required then there is **no reason** to change from the current European Standard Label.

- It is clear,
- It is easily understood
- It is already automatically on European product that comes here
- When placing orders from Europe, they mostly don't manufacture to order. Thus they send from existing stock. This makes the requirement to either unpackage, relabel with the Australian Label, and then repackage, either in Europe, or in Australia when the products arrive, totally unreasonable. This would be a waste of time and resources.
- Why not use the resources and time already been spent, and use the European system in its entirety. A lot of importers are small business, with little available resources to cover unnecessary red tape. We do not need to reinvent a wheel that is already invented.

Many thanks for the opportunity to submit this response

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