Opmerkingenformulier bij de consultatie over Richtlijnen voor het definiëren van 'substantiële modernisering'

UITLEG BIJ KOLOM 2
Type commentaar: G = algemene opmerking (General) C = inhoudelijke opmerking (Content) E = opmerking op vorm/taalgebruik (Editorial)

1	2	3	4
Naam firma/organisatie	**G / C / E**	**Opmerking / Vraag**	**Reactie Fluvius**
FEBEG	C	Replacement of limiting element Some explanation on what happens if this limiting element is a spare part would provide additional clarity, in particular regarding which of the two principles (spare part / limiting element) is predominant or if one is subordinate to the other.	The spare parts concept is predominant. The replacement of an equipment by a spare part never triggers a modernisation (even if the replaced equipment has been previously identified as a limiting element).
FEBEG	C	Process of a substantial modernisation Step 3/4: Spare parts If spare parts are used, the procedure must not be started… why is "The question on the possible use of identical spare parts" then mentioned?	The addition of the sentence "The question on the possible use of identical spare parts" while being in the modernisation process aims at handling situations where some (but not all) of the renewed equipments would be spare parts. In that case, only the renewed equipments which are not spare parts trigger the criterium 3 of the substantial modernisation in the framework of the European code RfG.