

To whom it may concern,
Sorry for delay but we have two suggestions for the Draft:

- “Addressee of regulation” phrase can be preferred instead of “users of regulation” phrase.
- The definition of “users of regulation” does not imply whether it covers positive or negative externalities stemming from regulation. It can be beneficial inserting an additional sentence into paragraph 23 to clarify does the “users of regulation” definition include external benefiterers or cost bearers.

Regards,

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