

**Consumer Council's Submission to the Bills Committee on
Energy Efficiency (Labelling of Products) Bill**

Introduction

1. The Consumer Council ("CC") supports the introduction of mandatory energy efficiency labelling as it would enlighten consumers on the energy efficiency of products to enable them to give greater consideration to this aspect when making their purchase decision. This in turn will encourage product suppliers to market more energy-efficient products.

2. CC would like to express views on energy efficiency and environmental protection in the following:

Laboratory accreditation (Section 6)

3. Under Section 6, manufacturers seeking registration of products are required to submit test reports. CC opines that there should be specific requirements on the qualification of test laboratories for the issuance of the test reports. The laboratories should have obtained accreditation by national or international laboratory accreditation bodies.

Frequency of registry information update (Section 10)

4. CC supports the proposal that importers or local manufacturers of registered products be required to provide the Electrical & Mechanical Services Department (EMSD) with a set of updated product information to ensure that the information at the EMSD's registry is up-to-date. However, updating once every five years proposed in section 10 of the draft Bill may not be adequate to reflect rapidly changing markets, especially for products of short product-life-cycle such as air conditioners, since many products are regularly modified to cope with changed market situation and consumer

demand. If manufacturers or importers are only obliged to provide updated product information every five years, a registered model could well have been discontinued during the long lapse. CC suggests shortening the update interval to at least once every three years.

Surveillance check test (Section 27)

5. Since the test reports accepted by EMSD for registration purpose will be on performance of test samples provided or selected by manufacturers, CC suggests that the Administration should conduct regular surveillance tests on registered products to ensure that the actual energy performances match the product claims.

Other relevant green information on the label (Schedule 2)

6. Schedule 2 of the draft Bill lists the content and specification requirements for labels of the three prescribed products. CC notes that the identity of refrigerant is only required for air conditioners, but not for refrigerators. As the use of different refrigerants would affect the environmental friendliness of these products, CC recommends that the labelling of the identity of refrigerant be extended to cover all appliances containing refrigerants.

Consumer Council's other comments:

More stringent grading thresholds

7. Mandatory EELS should help to reduce energy consumption and contribute to sustainable development in the long term. For the mandatory EELS to achieve the purpose of assisting consumers to better differentiate between products of different energy efficiency, and to make the appropriate choice, more stringent grading thresholds should be applied.

8. It is observed that under the existing voluntary EELS, a majority of the room coolers registered (which account for some 80% of room coolers on the market) bear the Grade 1 energy label. Since technology has been improving,

CC considers that regular updating and reviewing of the standards and indexing criteria adopted for the schemes should be conducted to reflect advances and to induce improvement. The Administration can make reference to the update made to the schemes in EU and Australia (such as the addition of the top grade A+ and 6-star ratings) in considering the necessity to raise thresholds. Only the very efficient products can be awarded the top rating.

Considerations on lifespan, waste treatment and recycling

9. CC opines that the life requirement under the scheme for compact fluorescent lamps (CFL) should be reasonably long (say 8,000 hours) so as to reduce the burden on landfill and to enhance environmental protection. The Administration should also actively encourage manufacturers of CFLs, air conditioners and refrigerating appliances to take back end-of-life CFLs and appliances for recycling. Other requirements on Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (RoHS) and Waste Electrical and Electronic Equipment (WEEE) should also be included in the Bill to ensure that registered products will comply with these environmental requirements.

Reasonable scope of coverage

10. CC supports adoption of a reasonably wide scope for the Bill to cover a great majority of air conditioners, refrigerators and CFL's models which can be purchased by consumers. For example, reverse cycle air conditioners and small refrigerators of capacity under 100 litres are appropriately included within the scope of the schemes because of their popularity and application in limited space.

Consumer Council

1 June 2007