

**Business Facilitation Advisory Committee**

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22 May 2007

Miss Mandy Poon  
Bills Committee on Energy Efficiency  
(Labelling of Products) Bill  
Legislative Council  
8 Jackson Road  
Central, Hong Kong

By e-mail: [mpoon@legco.gov.hk](mailto:mpoon@legco.gov.hk)

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Dear Miss Poon,

**Written submission**

Thank you for the invitation of 17.15.2007 for submissions on the Energy Efficiency (Labelling of Products) Bill. The Retail Task Force has been discussing the labelling scheme under the Bill with the Electrical and Mechanical Services Department (EMSD) and the Environmental Protection Department for more than a year and is happy to note that a self-testing system is being proposed in carrying out the labelling scheme which would alleviate business operators of the burden of a registration fee.

Under the self-testing system, energy efficiency labels have to be back up by relevant test reports. SMEs with limited resources, in general, receive less favourable trading terms and may have difficulty in gaining access to the required reports.

A recent survey conducted by the EMSD showed that about 10% of importers had not indicated that they could obtain the test reports from overseas manufacturers. The Task Force has no details of these 10% importers but suspects that they are likely to be the SMEs with weak bargaining power. To ease the burden of the proposed scheme on these small businesses, we suggest that once a test report has been submitted for a particular appliance, other importers of the same model will not have to submit test reports of the same model under the proposed scheme. This will eliminate any duplicate effort by other suppliers and/or manufacturers in

bringing the same model into the market. The Administration could also save some effort in running the proposed scheme.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Yu Pang-chun', with a horizontal line underneath.

(Yu Pang-chun)  
Convener  
Retail Task Force  
Business Facilitation Advisory Committee

cc Financial Secretary – Fax: 2840 0569