



**HONG KONG RETAIL MANAGEMENT ASSOCIATION**

**香港零售管理協會**

**Submission to the Bills Committee of Legislative Council on  
Energy Efficiency (Labelling of Products) Bill**  
**1 June 2007**

1. The Hong Kong Retail Management Association (“the Association”) supports the introduction of the Energy Efficiency (Labelling of Products) Bill, which we believe by extending the existing voluntary scheme to a mandatory one in phases, with the initial stage covering the three highest electricity consuming products, namely refrigerating appliances, room air conditioners, and compact fluorescent lamps, is in the correct direction in achieving efficient use of energy.
2. The Association appreciates the useful role of a mandatory labeling scheme in promoting energy efficiency and conservation as well as achieving sustainable developments. However, due to the relatively small size of our domestic market, there are concerns about the cost of “testing for the less popular brands, low volume low value items” and also where the manufacturers will not provide or cannot provide with the testing results. This may cause a barrier to entry for new brands and/or new models, hence reducing consumers’ choices.
3. The Association therefore maintains that before any decision made on expanding the scope of the mandatory scheme to cover other electrical appliances, the Government should carefully evaluate the effectiveness of the first phase of the mandatory scheme, while at the same time duly consult the trade and the community before moving to further inclusion of other products in the scheme.

25 May 2007