



CB(1) 1750/06-07(03)

Ref. No: 154-07-Legco-EEL

May 25, 2007

Legislative Council  
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Attn: Ms Mandy Poon  
Clerk to Bills Committee

Dear Committee Chair and Members,

**Invitation of Submissions Energy Efficiency (Labelling of Products) Bill**

As one of the leading NGOs focusing on environmentally preferable product certification, the Green Council is pleased to learn that the Energy Efficiency (Labelling of Products) Bill has been introduced to the Legislative Council for debate, and look forward to its enactment and implementation in the near future.

After reviewing the content of the proposed Energy Efficiency (Labelling of Products) Bill, and notably Schedule 2, Green Council officials have the following comments for consideration and possible incorporation into the Bill either now or at some future time:

**General Comments**

Clearly, the Bill will require industry and business sectors to consider and address the relative energy performance of their products marketed in Hong Kong. However, Green Council officials believe that the mandatory Energy Efficiency Label Scheme (EELS) should also enhance public/consumer awareness and capacity for the selection of better energy performance products versus alternatives. In this regard, we strongly recommend the implementation of multi-sectoral publicity and information dissemination campaigns regarding the purpose and nature of the Energy Efficiency Label to ensure widespread awareness, understanding and use by both product providers and consumers (i.e. government departments, institutions, commercial enterprises, households and individuals, etc.) in their respective decision-making processes.

As advocates and promoters of overall environmental performance leadership and recognition, Green Council officials would prefer to see the contents of the Bill include consideration of additional environmental performance aspects, including: low noise emission levels, low/no toxic substance contents, ease of disassembly/re-use/recyclability of the products and their components, etc. Nevertheless, we acknowledge that this Bill is focused on energy performance aspects of select products at this stage.

- 2 -

It is apparent that considerable effort has been taken in the development of key roles and processes involved in the design of the labelling scheme structure and components. In this regard, Green Council officials would like to see that the formulation of the "Code of Practice" will be similarly thorough and should involve extensive consultation with stakeholders to ensure appropriateness and practicality (i.e. credibility, relevance and responsiveness) of the Code of Practice for adoption and implementation.

In support of our general comments, the Green Council is in a strong position to assist in promoting the energy efficiency label to the broad Hong Kong community. Green Council efforts will be consistent with our vision and motto of "Conservation begins with Education". Such support will also be complementary to the Green Council's distinctive and internationally recognized Hong Kong Green Label Scheme (HKGLS) and Cyber Green Centre. Through these two ongoing initiatives, we are already identifying and publicizing a wide range of green products that are better environmental choices. Please visit our website - [www.greencouncil.org](http://www.greencouncil.org) -- for more details on the Green Council and its various initiatives.

### Specific Comments

- (a) Part 3, Schedule 2 - all "refrigerating appliances" should be separated and addressed under several sub-categories (e.g. "with freezing compartment" and "without freezing compartment", "single door" and "double door", "top mounted freezers" and "bottom mounted freezers", etc.) to enable useful comparison between "similar" products and because energy consumption levels may vary considerably between different types of products [i.e. product lines with significantly different features] within the broad category.
- (b) Part 2, Schedule 2 - to provide further useful performance characteristics for room air conditioners for consumers' references and consideration, the energy label could include indicators such as *cool performance (e.g. energy efficient ratio for cooling), drying performance, and noise emission levels.*
- (c) Part 3, Schedule 2 - the energy label could also include *noise emission levels.*
- (d) Part 4, Schedule 2 - the energy label could also include *luminous efficiency.*

The above summarizes the position of the Green Council on the Energy Efficiency (Labelling of Products) Bill.

Yours truly,



Linda W.P. Ho  
Chief Executive Officer  
Green Council

LH/sb/sc