



香港地產建設商會

THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG

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29 May 2007

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

Clerk to Bills Committee on Energy Efficiency
(Labelling of Products) Bill
Legislative Council Secretariat
8 Jackson Road
Central
Hong Kong
(Attn.: Ms. Debbie Yau)

Dear Ms. Yau

Bills Committee on Energy Efficiency (Labelling of Products) Bill

We thank you for your letter of 17 May and as requested, would like to provide our comments on the above Bill as follows.

We understand the rationale of and support the principle behind the proposed mandatory energy efficiency labelling scheme in encouraging the use of energy efficient products. However, the scope of “supply” and “application” as currently drafted in the Bill is too wide and would have undesired and undesirable implications.

For example, supply includes “for commercial purposes, to give the prescribed product as a prize or to make a gift of such a product”, and application covers “a prescribed product supplied as part of or in connection with the disposition of any specified premises”. In so far as the provision of electrical appliances in first-hand properties is concerned, developers are actually purchasers of such appliances and should therefore be treated just like any other consumers and not as suppliers. For the sake of reasonableness and clarity, it is our view that the application of the proposed labelling scheme should be limited to the manufacturers, importers and retailers of such products only.

Please note that we shall not be attending the Bills Committee meeting on 1 June.

Yours sincerely

Louis Loong
Secretary General