

OPF0255/07
19 November 2007

CB(1) 307/07-08(05)

Legislative Council
Legislative Council Secretariat
3rd Floor, Citibank Tower
3 Garden Road, Central
Hong KongAttn : Ms. Becky Yu
c.c. EMSD - Mr. Y.K. ChanFax 2121 0420
Fax 2890 6081Re: Code of Practice on Energy Efficiency Labeling of Product

Dear Chairman & Members of Bills Committee,

We write to express our concern about the sustainability of the above code of practice and would like to suggest improvements.

OSRAM, as one of the two biggest lamp source suppliers worldwide, fully agrees on the approach of having a mandatory energy label on the lamps. A supporter since the Voluntary Scheme took place in 1995, OSRAM believes that this approach will help the public choose good quality and environmental friendly products, which ultimately leads to protection of our environment.

Being a member in the energy label task force coordinated by EMSD, we have been participating in the drafting and modification of the Code of Practice. We are glad to see that the correlation between longer life time and less electronic waste has been well recognized, which has led to the change of life time of Grade 1 and Grade 2 lamps from 6,000 hours to 8,000 hours in the latest draft Code of Practice.

However, this latest criteria does not fulfill the objectives of energy efficiency and environmental protection in the long term. Grade 1 and 2 should have distinctively better performance over the other grades in these aspects, so that Hong Kong can truly achieve energy saving and reduce electronic waste should consumers be educated to understand the benefits of different energy labels.

Therefore we strongly propose to revise the grading standard; with increased lifetime on Grade 1 and 2 to 15,000 hrs and 10,000 hrs respectively, and improved lumen maintenance in Grade 1 from 80% to 85%:

	Grade 1	Grade 2	Grade 3	Grade 4	Grade 5
Life time	15,000 hrs	10,000 hrs	6,000 hrs	6,000 hrs	Below 6,000 hrs
Lumen Maintenance	85%	80%	78%	78%	Below 78%
Lumen Efficacy	No change	No change	No change	No change	No change

The above proposal will not only help to reduce electronic waste by half, but also address the trend that the world is moving towards longer life products to reduce waste. By international standard, an 8,000 hr CFLi does not really qualify to be Grade 1. If we do not raise the standard to a desirable level at the inception of the scheme, the momentum to promote environmental protection in Hong Kong will be limited, as there leaves no room for giving a longer-life lamp a higher grading when the market demands CFLi lamps with much longer lifetime than 8,000 hr.

OSRAM PROSPERITY

OSRAM has been producing 15,000 hours long life CFLi for over 10 years and is now developing the 20,000 hours CFLi. Other lamp manufacturers are driving towards the same direction. Although 15,000 hrs CFLi is not yet widely used in Hong Kong at this moment, the impact of the global trend on the sustainability of our EELS must not be taken lightly. Environmental protection is a long term issue that requires cooperation and involvement by all consumers. It is important that we make the EELS an effective tool to improve our environment and protect the earth in the long term.

Please consider our proposal.

Thank you for your attention.

Yours sincerely
OSRAM PROSPERITY CO., LTD.



Anthony Chong
Asst. Sales & Marketing Manager

OSRAM PROSPERITY CO., LTD.
歐司朗佑昌有限公司

Tel: (852) 2511 2268 Fax: (852) 2511 2038 E-mail: info@osram.com.hk
Rm. 4007-09 Office Tower, Convention Plaza, 1 Harbour Rd., Wanchai, Hong Kong.
香港灣仔港灣道一號會展廣場辦公大樓 4007-09 室



Certificate No. Q14595