



Hong Kong General Chamber of Commerce
香港總商會 1861

香港總商會
香港中環皇后大道中
Hong Kong General Chamber of Commerce
22/F United Centre
88 Queensway, Hong Kong
Tel: (852) 2529 9329
Fax: (852) 2527 9843
Email: chamber@hambur.org.hk
www.chamber.org.hk

Helping Business since 1861

4 October 2007

Our Ref: CC195

Special Duty Division
Commerce and Economic Development Bureau
Level 29, One Pacific Place
88 Queensway
Hong Kong

Dear Sirs

Measures to enhance consumer protection

Thank you for inviting the Chamber to consider the consultation paper on “proposed amendments to the Trade Descriptions Ordinance to strengthen consumer protection”. We have consulted relevant stakeholders within the Chamber, including our Retail/Distribution Committee, and would like to make the following comments.

In general, we support clarification of the Ordinance to deal with the deceptive, misleading and unfair trade practices during the course of the retail business. The latter has led in recent years to widespread public concern, affecting Hong Kong’s image both locally and in the Mainland, and must now be rectified.

On the proposed amendments specifically, however, we would like to reflect a concern expressed by general retailers as follows.

Firstly, the proposed legislative amendments seem in effect to be putting all the legal responsibilities upon the sellers of specialty items (including diamond, gold items, platinum, natural fei cui, electronic products) to make full and clear product description to general consumers. However, given the special nature of these

products, the original manufacturers and/or the importers should also assume such responsibilities.

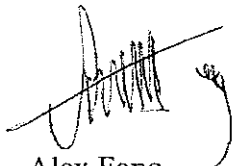
Secondly, with reference to Annex 2 on supply of information, the information required to be furnished in the seller's invoice appears too technical and cumbersome and is difficult to handle by general retailers.

In its present form, the proposed amendments may prohibit the sale of such specialty items by general retailers. If these items would only be found in specialty stores in the future, it would be very inconvenient to consumers and tourists and the business of general retailers would be adversely affected.

While agreeing with the legislative intent of enhancing consumer protection, therefore, we advise the government to draft the amendment in such a way to alleviate the above concern of the general retailers.

I hope you will find the comments useful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alex Fong', with a large, sweeping flourish extending from the end of the signature.

Alex Fong

CEO