



REGENT SILVERWARE MANUFACTURING LTD.

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December 12, 2011

Bills Committee on Competition Bill  
Legislative Council  
Legislative Council Complex, 1 Legislative Council Road, Central, Hong Kong  
(by post and by email to "cb2@legco.gov.hk")

Commerce & Economic Development Bureau  
23/F, West Wing, Central Government Offices, 2 Tim Mei Avenue, Tamar, Hong Kong

Attn: Ms. Linda Lai  
Deputy Secretary for Commerce & Economic Development  
(by post and by email to "linda\_lai@cedb.gov.hk")

Dear Sir/Madam

With regard to the Competition Bill being proposed, our company wishes to express some opinion as an export trading company in Hong Kong.

First, we understand that being an SME (Small to Medium Enterprise) and a company in the export trading sector, the direct impact by the Law would be of our less concern.

Rather, we are concerned about the various statutory bodies of whom we having been using the services for long time as an SME exporter.

It is learnt that the Law is now being considered on its scope of exemption, if any, against the various statutory bodies. Those we are related to, which I can name, are HKECIC (Hong Kong Export Credit Insurance Corporation), HKTDC (Hong Kong Trade Development Council), HKPC (Hong Kong Productivity Council). From these statutory or "semi-government" organizations, we have been using the services for long time, some more frequent, some less. As a service user, we are quite concerned about whether the quality, cost and comprehensiveness of service which we are getting from these organizations could be influenced by the new Law. And will any of these organizations no longer be able to perform their original functions effectively and ultimately disappear?

Taking HKTDC, with which we have regular and frequent interaction, as example. We have regularly joined the trade fairs in Hong Kong as exhibitor for more than 15 years. In our industry (houseware products), there are two very important trade fair events every year, respectively in April and in October; we have participated in both fairs every time since 1996. The one in April is organized by HKTDC and the one in October is not. The two fairs have very similar nature and they even take the same venue (HKCEC). As a user (consumer of exhibition service), however, we always find better satisfaction with the one organized by HKTDC in terms of the arrangement, support, responsiveness and the rental cost. Besides, there are other useful services than trade fairs that HKTDC is offering in the sector.

These "semi-government" organizations are of non-profit-making nature. They are not business entities and are running with an aim of offering assistance to those in need instead of earning profit. These organizations may (and should, to our opinion) offer priority or preferential terms to Hong Kong companies and individuals in certain area or services in order to promote Hong Kong business. I have read some articles that if the Law is implemented without suitable exemption, HKTDC may have to adjust their price-setting approach and stop offering better terms for Hong Kong companies, ending up possibly in fee increment on some of their services we are using.



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The Competition Bill aims at facilitating competition, that drives away those noncompetitive entities. Certainly there is room for improvement for these organizations, but should their position be justified by how competitive they are in their scope of service? Or are they taking certain role in serving the community that we wish them to be there?

We wish our opinion be given the appropriate consideration. Thank you for the time.

Yours faithfully

Wilson LEE  
Director