

**Submission of the Consumer Council to the
Subcommittee on Energy Efficiency (Labelling of Products)
Ordinance (Amendment of Schedules) Order 2009**

Washing Machines and Dehumidifiers

1. The Consumer Council (“CC”) is pleased to make the following submission on the Energy Efficiency (Labelling of Products) Ordinance (Amendment of Schedules) Order 2009.
2. CC supports the introduction of mandatory energy efficiency labelling for washing machines and dehumidifiers as it would enlighten consumers on the energy efficiency of these products to enable them to give greater consideration to this aspect when making their purchase decision. This in turn will encourage product suppliers to market more energy-efficient products.
3. Since their respective launch in 1997 and 2002, the voluntary energy efficiency labelling schemes for washing machines and dehumidifiers have not had high penetration rates. Their latest penetration rates stand at 29% and 26% only. A mandatory labelling scheme would change the situation and make product comparison much easier for consumers.
4. For dehumidifiers, CC supports the change from a “recognition type” energy label to a “grading type” energy label, because the latter is more informative. Similar change was made in the first phase of the mandatory energy efficiency labelling scheme for compact fluorescent lamps and the transition was successful.
5. CC observes that many manufacturers use the non-standard test conditions of 30°C / 80% relative humidity (RH) for their claimed dehumidifying capacity. CC is of the view that such test conditions do not realistically reflect the indoor environment when a dehumidifier is operating with the windows closed.
6. CC supports the adoption of ANSI / AHAM standard testing conditions of 26.7°C and 60%RH. These test conditions are in line with those stipulated in standards such as the GB standard (mainland China), JIS standard (Japan) and standards of many other jurisdictions.

7. CC proposes that desiccant type (熱石式) dehumidifiers, which do not work with compressors and refrigerant, be included into the mandatory labelling scheme when relevant performance testing standard becomes available in the future.
8. Regarding washing machines, CC welcomes the inclusion of washer-dryers into the mandatory labelling scheme, although the energy performance of clothes drying will not be evaluated. CC is of the view that the clothes drying function should be included in the evaluation if energy performance standard for a washer-dryer's clothes drying function becomes available in the future.
9. The scope of coverage should also be reasonably wide to cover a large proportion of washing machines and dehumidifiers which are available to consumers in the market. For example, larger household washing machines of rated washing capacity slightly higher than 7 kg should also fall within the scope of the scheme.

Consumer Council
1 December 2009