

The Hong Kong General Chamber of Commerce 香 港 總 畜 會

23 January 1995 Our Ref: YSC:012

Electrical & Mechanical Services Department 98 Caroline Hill Road Hong Kong

Dear Sir/Madam

Voluntary Energy Efficiency Labelling Scheme

The Environmental Committee of the Hong Kong General Chamber of Commerce have been asked to comment on the Government Proposal to Introduce a Voluntary Energy Efficiency Labelling Scheme (EELS) to Hong Kong. The committee wish to encourage the Government to introduce an EELS and both EMSD and the Energy Efficiency Advisory Committee are to be congratulated for this initiative.

Whilst we strongly support the initiative which will promote the awareness of energy conservation and environmental improvement needs amongst consumers, we recommend the following two approaches which might bring about changes in attitude from both the manufacturers and the consumers much quicker than it is anticipated:

- 1. The Scheme be extended, over a period of time, to cover a wider range of household applicances.
- 2. The Scheme be converted into a mandatory one after a fixed "grace period" of being voluntary.

Other points of interest are:

Education and Promotion

The EELS is unlikely to be effective without some form of consumer education and promotion through the mass media. Retailers should be encouraged to provide their own promotional efforts and be encouraged to provide their sales personnel with basic information on the EELS so they may better answer customer questions.

Design of the Label

The average consumer has little understanding or concern about kilowatt hours. Kilowatt hours do not have much significance to the man in the street, nor does he appreciate the value of these units.

However, the consumer does understand \$s.

Notwithstanding the problem of frequent changes in electricity tariffs, we recommend that a way be found of providing the customer with a ready reckoner which converts kilowatt hours to \$ at the current tariffs for a typical year's usage.

Two other more general points on the design of the label are:

- 1. The design of the labels in different countries should resemble each other. For example, if the European labels use a scale of A-G, perhaps we should also consider using A-G rather than 1-6 even though the local language is Chinese.
- 2. As far as possible we should try to standardize the EELS with our other Asian neighbours and other existing EELS.

Position of the Label

The label should be located in a prominent position such as the upper right hand front corner of the appliance.

The Committee would also like to draw your attention to a study, if, by incidence, you have not seen it yet, by Miss Wendy Leung Wai Kuen entitled "Household Energy Use and Energy Conservation In Hong Kong" for the University of Hong Kong, which contains useful information and excellent ideas in relation to the Scheme.

We hope the above comments would contribute to your further deliberation of the Scheme. We are looking forward to see the introduction of an EELS to Hong Kong, sooner rather than later.

Yours sincerely

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YSC/PL