

13th September 2006

Policy Officer
DG Energy and Transport,
Directorate D, Unit D3
Rue de Mot 24
Brussels
B-1040

RE: *WTO Notification G/TBT/N/HLG/26 – Proposed Mandatory Energy Efficiency Labelling Scheme in Hong Kong, China*

Dear Mr. Toth,

Thank you for your email dated 5th September 2006. We welcome the opportunity to comment on the WTO Notification G/TBT/N/HLG/26 – *Proposed Mandatory Energy Efficiency Labelling Scheme in Hong Kong, China*.

The ELC greets the Energy Efficiency Labelling Scheme, proposed by Hong Kong, China to increase the awareness and supply of energy efficient technologies, especially as far as 'Energy Savers' are concerned. 'Energy Savers' placed on the European market achieve an Energy Label category A or B. We commend the proposal by Hong Kong China, to proliferate these ratings into more detailed categories. We understand the notification refers to two lamp types, the:

- Compact fluorescent lamp integrated with built in control gear (**CFLi**); and
- Compact fluorescent lamp without built in control gear (**CFLni**).

To ensure our response addresses the documents attached in your email, we provide a technical response (referring to the *Code of Practice on Compact Fluorescent Lamps*); followed by a request for further guidance.

Testing and Performance Criteria

- **Design** – Section 6.2 on Energy Efficiency Grading, refers to a lumen maintenance parameter of '*2,000 hours shall not be less than 78%*¹'. The referenced parameter in the International IEC 60969 Standard for lumen maintenance, states compliance with published data, such as a rate of 80% - 85%. We would suggest that this design parameter is aligned with the referenced standard.
- **Lifetimes** – Section 6.2 on the Energy Efficiency Grading, refers - '*average lamp life shall not be less than 6,000 hours*¹', and does not delineate between the CFLi and CFLni lamp types. We propose that the lifetime for a CFLi lamp is aligned with this criterion; however, we would like to request the criteria to state 10,000 hours for CFLni for ECG operation, and 8,000 hours for conventional control gear. We propose these lifetimes could satisfy the Grading criteria 1 through 4; and lamps with lower lifetimes, to be placed in Grade 5.
- **Luminous Efficacy** - We believe the minimum allowable luminous efficacy (lumen/W), listed in Table 1 and Table 2, is more stringent than current industry standards. We propose that our comments (listed in the Appendix to this letter) are included, in the Code of Practice.

¹ Code of Practice on Compact Fluorescent Lamps under the Mandatory Energy Efficiency Labelling Scheme – Annex C of WTO Notification Document (Draft)

Guidance

We seek further clarification and guidance on the following issues listed below.

- **Non-standardised lamps** – This Notification indicates allowance of CFLi and CFLni lamps to be placed on the market in Hong Kong China, which conform to the international standards in the *Code of Practice on Compact Fluorescent Lamps*. We seek clarification for lamps that are not referred to in any standards, such as the integral or high wattage 2D lamp. Will this notification restrict the sale or placing on the market of these lamp types in Hong Kong China?
- **Technical parameters** – We are keen to know what light colour is used to measure lumens (performance differs per colour temperature, this being 2700K)? What power factor is used for this analysis?
- **Testing** – With regard to the number of lamp types to be tested and the high costs for 3rd party verification incurred, we request use of manufacturer's self declaration.
- **Labelling** – The lamp market in Hong Kong China is relatively small compared to other markets, in which ELC member companies currently conduct their business. We seek approval to place the Energy Efficiency Label, as a self-adhesive sticker on the lamp packaging.

Currently, 40 countries use different labeling schemes, to rate the energy-efficiency of a product. We request to be notified, if this Notification or similar Notifications, is extended into future markets.

I trust the information we have provided is clear. Please do not hesitate to contact me, should you have any further queries.

Yours sincerely,

A handwritten signature in blue ink on a light-colored background. The signature is cursive and appears to read 'Gerald Strickland'.

Gerald Strickland
Secretary General

Copy to: A. Brisaer (DG TREN), M. Kestner (DG TREN), I. Gronroos-Saikkala (DG TREN) and S. Mittelham (CELMA)

Appendix – Proposed Amendments

WTO Notification G/TBT/N/HLG/26 – Proposed Mandatory Energy Efficiency Labelling Scheme in Hong Kong, China

Code of Practice on Compact Fluorescent lamps

- **2.1 (b)** We believe there should be no limits.
- **Page 3** – The reference ballast should simply refer to relevant standards. The paper needs not state further points.
 - An extra point is needed to discuss the ECG Ballast/CCG Ballast.
- **4.1 (a)** Acknowledgement is required that there are normal stick type lamps; decorative candle and GLS shaped lamps.
- **4.1 (b)** Acknowledgement is required that these lamps come with and without Amalgam, which affects testing procedures. Some decorative lamps are now also appearing on the market.
- **5.3.3**
 - The ballast used shall comply with the requirements of IEC 921 or EN60921. It shall be rated as specified on the relevant lamp data sheet.
- **5.4.2** The supply voltage shall be equal to the rated voltage of the reference ballast. During periods of stabilisation, the supply voltage shall be stable within $\pm 0,5\%$ - this tolerance being reduced to $\pm 0,2\%$ during measurement.
- **5.4.3 (b)** Test lamps will be tested as described in the relevant lamp standard.
- **5.6** Reference should be for IEC 60901 **and** IEC 60969.
- **5.7** For all types of CFLi's....IEC 60969. For all CFLni's without integrated control gear refer to IEC 60901.
- **6.2**
 - We believe the lumen levels and the watt steps are wrongly placed and propose the following.

Built in Control Gear Stick with 2700K(non Decorative – for decorative types lower levels must be accepted,)

Rated Lamp Wattage	Minimum Allowable Luminous Efficacy (Lumen/W)				
	Grade 1	Grade 2	Grade 3	Grade 4	Grade 5
	Note (2a)				Note (2b)
≤ 12W	49,5	44,55			
13W-24W	55	49,5			
≥ 25W	60,5	54,45			

Without Built in Control Gear Stick with 2700K (non Decorative – for decorative types lower levels must be accepted)

Rated Lamp Wattage	Minimum Allowable Luminous Efficacy (Lumen/W)				
	Grade 1	Grade 2	Grade 3	Grade 4	Grade 5
	Note (2a)				Note (2b)
≤ 10W	≥55	55,0>X≥50,0	50,0>X≥45,0	<45,0	
11W-50W	≥71,5	71,5>X≥65,0	65,0>X≥58,5	<58,5	
≥ 51W	≥82,5	82,5>X≥75,0	75,0>X≥67,5	<67,5	

- **7.1** We propose this should read 100% +5%, instead of 115%.