

## Introduction

The Hong Kong Association of Energy Service Companies Limited (HAESCO) was founded in January 2008, and is a professional non-profit trade organisation with its headquarters in Hong Kong. Our membership includes a wide range of specialists from the energy service sector, including ESCO's, legal advisers, facilitators, consultants, financiers, and insurers. We aim to bring about a more liveable Asia by facilitating organisations to leverage the advantages of increased energy efficiency and the application of clean technologies.

## Part I

Organisation: Hong Kong Association of Energy Services Companies (HAESCO)

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## Part II

We would like to respond to the captioned consultative document as follows:

- (1) We opt and support the restriction of the supply of energy-inefficient incandescent light bulbs (ILB) as soon as possible. In order to ensure the effectiveness, the Government should implement mandatory restriction schemes similar to other overseas countries such as Australia, North America and EU.
- (2) The types of ILB that should be restricted if a mandatory scheme is introduced to restrict the supply of ILB include all type of lamps. However, special

consideration should be given for lamps type that have no substitute.

- (3) We support the use of minimum energy performance standards (MEPS) to restrict the import and supply of low efficiency lamps and should use this criteria to determine the type of ILB and non-ILB that can still continue to be used in Hong Kong.

The concern about the increased mercury emission from the use of CFL is grossly misleading. According to USEPA study, the major source of mercury into the environment is from the coal-fired electrical power. Reducing power consumption will definitely beneficial to mercury reduction. The study revealed that the mercury emission from the use of CFL was in fact about 70% less than the use of incandescent lamp which consumed excess energy. Further mercury emission reduction can be achieved if proper treatment facility is available to extract the mercury out of the disposed CFL. The Government should not constraint itself in promoting the use of CFL to replace ILB.

If you have any queries concerning the above response, please feel free to contact us.

HAESCO Chairman  
11 November 2011