

By post and by email at [meels\\_review@emsd.gov.hk](mailto:meels_review@emsd.gov.hk)

31 May 2021

Energy Efficiency Office  
Electrical and Mechanical Services Department  
3 Kai Shing Street  
Kowloon

Dear Sir/Madam

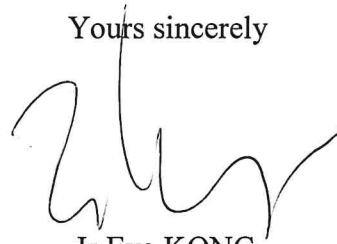
**Views from The Hong Kong Institution of Engineers  
on the Fourth Phase of the Mandatory Energy Efficiency Labelling Scheme**

On behalf of the Institution, I am pleased to present to you our views and suggestions as set out in the enclosure for your kind consideration on the captioned subject.

With our expertise and experience, the Institution welcomes the opportunity to work with the Government on the area of concern if and when it is needed.

Thank you.

Yours sincerely



Ir Eva KONG  
Director

CKH/SS

**Enclosure**

**Views from The Hong Kong Institution of Engineers  
Regarding the Public Consultation on  
the Fourth Phase of the Mandatory Energy Efficiency Labelling Scheme**

The Hong Kong Institution of Engineers (HKIE) would like to provide the following views and suggestions regarding the consultation on the Fourth Phase of the Mandatory Energy Efficiency Labelling Scheme (MEELS) for the Electrical and Mechanical Services Department (EMSD)'s consideration:

2. Since the implementation of MEELS in May 2008, energy labels are now mandatorily affixed to eight types of consumer products including refrigerating appliances, compact fluorescent lamps (CFLs), dehumidifiers, room air conditioners, washing machines, televisions, storage type electric water heaters and induction cookers. Light-emitting diode (LED) lamps, gas cookers and gas instantaneous water heater are, on the other hand, covered in the Voluntary Energy Efficiency Labelling Scheme (VEELS).
3. LED lamps, gas cookers and instantaneous gas water heaters account for about 31% of the total energy consumption in the residential sector in 2018. The inclusion of these appliances in the MEELS is expected to increase the said total energy consumption to around 80%, based on the Hong Kong Energy End-use Data 2020<sup>1</sup>.
4. The Institution is of the view that the energy labels for LED lamp should list information on the rated efficacy, the rated power and the rated lamp life. Interim test reports and progress reports is suggested to be submitted by the trade in applying for the LED lamp energy labels. In addition, the Institution agrees to the inclusion of white tunable LED lamps in the MEELS.
5. With regard to the proposed inclusion of gas cookers in the MEELS, the Institution considers it necessary to cover all table-top and built-in type gas cookers with burners, as well as hybrid type gas cookers. For hybrid type gas cookers, only

---

<sup>1</sup> Public Consultation document for Proposal on the Coverage of New Potential Products under the Fourth Phase of the Mandatory Energy Efficiency Labelling Scheme (MEELS) – March 2021

the energy efficiency performance of the burners is expected to be assessed. The Institution suggests that burners with rated power of  $\leq 5.92$  kW and between 5.92 and 7kW should be adopted in the scope of power rating coverage. For energy labels of gas cookers, the Institution opines that details of the thermal efficiency (gas) and rated power should be included to facilitate consumers' comparison of product models based on the energy efficiency performance, and the tested thermal efficiency is expected to be no less than 95% of the measured values submitted by the trade for application for the MEELS.

---

6. As for instantaneous gas water heaters, the Institution suggests including information about the thermal efficiency (gas) at 100% and 50% load conditions, and the rated power as well as the hot water supply. When applying for the MEELS for instantaneous gas water heaters, the tested thermal efficiency submitted should not be less than 97% of the measured values.

7. Given that the VEELS for gas cookers and gas instantaneous water heaters will be revamped, and to familiarise the trade with the new energy requirements of the gas appliances in the MEELS, a grace period of 18 months is suggested for the fourth phase of the MEELS.

8. If gas appliances are included in the MEELS, the Institution expects only Grade 1 gas appliances would be acceptable for the general public.

9. In addition to the proposed new items including LED lamps, gas cookers and instantaneous gas water heaters, the Institution suggests the EMSD consider including air handling units in the MEELS.