

中国 WTO/TBT 国家通报咨询中心

China WTO/TBT National Notification & Enquiry Center

No.7, Ma Dian Dong Ave, Hai Dian District, Beijing, China, Tel: 86 10 8226 0618 Fax: 86 10 8226 2448

FAX

TO: National Center for Standards and Certification Information National Institute of Standards and Technology Bldg. 820, Room 164 Gaithersburg, MD 20899	Fax: + (1 301) 926 15 59 Tel: + (1 301) 975 40 40 E-mail: ncsci@nist.gov
Date: Sep. 8, 2006	Number of pages: 3+1
Copies: Department for WTO Affairs, Ministry of Commerce of P.R.China	Fax: +86 10 65197726;65128304 E-mail: wtonoti@mofcom.gov.cn liuna@mofcom.gov.cn
Permanent Mission of P.R. of China to WTO	Fax: +41-22-9097699/9097688 E-mail: guoxy@aqsiq.gov.cn
WTO Affairs Office, General Administration for Quality Supervision, Inspection and Quarantine, P.R.C.	Fax: +86 10 82260553 E-mail: wto@aqsiq.gov.cn
Department for Supervision on Inspection, AQSIQ of P.R.China	Fax: +86 10 82260165 E-mail: yangws@aqsiq.gov.cn liusy@aqsiq.gov.cn
From: China WTO/TBT National Notification & Enquiry Center, Standard and Regulation Researching Center, AQSIQ, P.R.China.	Tel: 86-10-82260618 Fax: 86-10-82262448 E-mail: tbt@aqsiq.gov.cn
Subject: Comments from China on USA Notification G/TBT/N/USA/197 Appliance Labelling Rule	

Comments from China on USA Notification

G/TBT/N/USA/197

Appliance Labelling Rule

Dear Sir or Madam,

We appreciate the opportunity to submit comments on this regulation proposed by Federal Trade Commission (FTC).

Enclosed please find the comments in English and Chinese.

Please acknowledge receipt of comments by e-mail to tbt@aqsiq.gov.cn.

Thank you very much in advance for Federal Trade Commission taking our comments into consideration.

Best regards

Huang GuanSheng
Director General
China WTO/TBT National Notification & Enquiry Center
No. 9 Ma Dian Dong Lu, Hai Dian District, Beijing
Post Code: 100088
Tel: 86-10-82260611/0618
Fax:86-10-82262448
E-mail: tbt@aqsiq.gov.cn

COMMENTS FROM CHINA ON USA NOTIFICATION

G/TBT/N/USA/197

Appliance Labelling Rule

Chinese government appreciates that U.S. proposed the Appliance Labeling Rule on ceiling fans for the purpose of energy conservation, and thanks U.S. for providing opportunities for WTO Members to submit comments. China would like to make the following comments on G/TBT/N/USA/197:

1. We suggest that the test method set out in international standard IEC60879-1986 be adopted as the test method of Appliance Labeling Rule on ceiling fans. Discrepancy between IEC test method and the U.S. ones needs to be explained.
2. Before the labeling requirements of ceiling fan entry into force in January 1, 2009, the labeling requirements of highly decorative fans with air movement performance is the secondary design feature should be exempted. Regulation to distinguish fan categories to be exempted from the labeling requirements should be issued as soon as possible.
3. The final test procedure and method for parameters required by energy label should be confirmed by U.S. as soon as possible, and published in time. At the same time, the test facilities applicable for the test procedure and method should also be specified in detail.
4. The proposed Rule requires manufacturers to submit information on applicable type of airflow, energy efficiency and airflow efficiency of ceiling fans to FTC. Explaining is needed on:

Through which approach the manufacturers outside the U.S. should submit their reports?

Should they provide the report that third party has been accredited?

Should they submit the report annually?

How does U.S. confirm the submitting report?

If the confirmation is in written form, how long would this reply period last?

We hope the above mentioned questions be clearly explained at an early date.

5. The range of energy efficiency value should be dynamic, and be published by FTC periodically. The actualization and product's manufacturing cost of most ceiling fan products should be well considered in setting the efficiency range. The energy efficiency range, the minimum requirements of airflow and airflow efficiency of all kinds of ceiling fans should be published as early as possible.
6. The labels directly sticking on a ceiling fan itself should not affect the out-looking of the ceiling fan product and its operation balance. Manufacturers can be required to stick the labels on the outside of the package. As for the location of "Money-Saving Tip: Turn off fan when leaving room", it may be revised as "place it to the suitable position on the ceiling fan's switch box", so as to remind the users in their daily usage.

Comments in Chinese are in below:

中国政府赞赏美国为节约能源之目的，提出吊扇的《器具标签规则》，并感谢美国给予 WTO 各成员评议的机会。中国对 G/TBT/N/USA/197 通报提出以下评议意见：

1. 建议吊扇《器具标签规则》的测试方法，采用国际标准 IEC60879-1986 规定的测试方法。美方应该对其测试方法与 IEC 测试方法之间的差异做出充分的解释和说明。

2. 在 2009 年 1 月 1 日实施吊扇的标签要求前，应免除将空气流通作为次要设计特点的豪华电扇的标签要求。确定免除标签要求的电扇种类的法规应该尽早出台。

3. 美方应尽快确定能效标签要求参数的最终测试程序和方法，并及时公布。对适用该测试程序和方法的试验设备也要做出详尽的说明。

4. 通报要求由制造商向 FTC 提交吊扇适用的类型的气流、功率消耗和高速状态下的气流效率的信息报告。美方应该说明，国外的制造商通过何种渠道提交报告？是否必需提供获得认可的第三方的报告？是否也要每年度提交？对提交的报告美方如何予以确认？如果是书面确认，回复周期有多长？这些内容应该尽早予以明确说明。

5. 能效值范围应该是动态的，应定期由 FTC 公布。能效值范围的设定应充分考虑目前多数吊扇产品的可实现性及产品的制造成本。应该尽早公布能效值范围，以及各类吊扇产品气流和气流效率的最低要求。

6. 标签粘贴在吊扇本体上应该不能影响吊扇产品的美观及其运行的平衡。可以要求制造商在包装箱外粘贴标签。对于“省钱提示：离开房间时关掉电扇”的粘贴位置应修改为“在吊扇开关上的适当位置”，以使用户日常使用时给予提醒。