

反對惡性競爭 抗議與民爭利

香港貿易發展局的功能與角色檢討

立場書

建發國際(控股)有限公司

1. 香港貿易發展局成立於一九六六年，作為法定機構，貿發局成立的的目的和功能清楚訂明如下：
    - 一、 推廣、協助及發展香港海外貿易，尤以出口產品為主；
    - 二、 向政府提出適當建議，採取有效措施促進本港貿易增長。
  2. 過去數十年來，貿發局無疑發揮了應有的歷史作用，扮演了積極推廣本港出口貿易的角色。但隨著本港經濟的結構性轉型，服務業現時已經茁壯成長，成為本港經濟的重要支柱之一，會議展覽業更是發展成熟，成行成市，足以提供與貿發局相同的服務。
  3. 事實上，香港目前已毫無疑問成為亞洲展覽之都。以二〇〇三年為例，香港合共舉辦了十五個符合國際展覽聯盟(Union des Foires Internationales (UFI))標準的展覽會，成為亞洲舉辦同類型展覽會最多的城市。同期，新加坡只舉辦了十二個同類型展覽會，其餘依次為漢城(七個)、耶加達(六個)、台北(三個)、吉隆坡(三個)、新德里(二個)、東京(二個)、曼谷(一個)、大連(一個)、馬尼拉(一個)和大板(一個)，可見香港在區內的地位和成就。
  4. 除了符合國際展覽聯盟標準的展覽會外，香港每年舉辦的大型展覽會<sup>①</sup>在回歸後亦見顯著增加，由一九九七年的四十七個增加至二〇〇二年的六十七個，增長率高達 43%，說明會議展覽業在本港已經發展成熟，市場自給自足，成為本港服務業一個重要組成部分，足以為會議展覽業提供盈利可觀的市場空間。有鑑於此，貿發局在促進本港貿易發展上扮演的角色和功能實在大有檢討之必要，因為貿發局原來用以協助本港中小型企業開拓出口貿易而舉辦之展覽會已反客為主、倒果為因，不單成為貿發局最主要的收入來源，更不成比例地佔去有關業務的最大市場份額，在經濟上產生「擠掉效應」(Crowding-out Effect)，嚴重扼殺同類私營企業的生存空間。
  5. 根據建發國際(控股)有限公司進行的調查所得，由二〇〇二年至二〇〇四年三年間，以規模佔用三個場館的大型展覽會計算，由貿發局主辦的展覽會竟然平均高達八成以上，分別為九:一(二〇〇二年，90% : 10%)、十:四(二〇〇三年，71.43% : 28.57%)和十一:二(二〇〇四年，84.16% : 15.38%)。收入方面，儘管以每個展覽會平均產生的經濟效益計算，貿發局遠不及私營企業，但仍佔收入總額六成以上，過去三年的數字分別為二億七千二百三十七萬對一億三千三百六十五萬(二〇〇二年，67.08% : 39.92%)，三億零四百九十萬對二億零六百萬(二〇〇三年，60.32% : 39.68%)和三億九千八百二十七萬對一億九千一百八十一萬(二〇〇四年，67.49% : 32.51%)(參見附件一和附件二)。
- <sup>①</sup> 按照香港展覽會議協會的定義，展場面積超逾二千平方尺即為大型展覽會。

事實充分證明，經營欠缺效益的貿發局在本港會議展覽業上已佔有壟斷性的支配地位，嚴重威脅同類私營企業的存在，更由於貿發局是接受公帑資助的法定機構，且身兼全港最大展覽場地香港會議展覽中心的地主，佔盡優勢，因而已對同類私營企業構成不公平的惡性競爭，嚴重扼殺後者的生存空間。

6. 毋庸置疑，貿發局已出現了角色衝突的問題。作為法定機構，在當前本港內外經濟氣候和營商環境已經急劇轉變的情況下，它扮演的角色和功能都應該有重新檢討和釐訂的必要。二〇〇〇年，香港展覽會議協會在立法會貿易及工業小組會議上已經促請政府注意有關問題，指出貿發局屬下的展覽服務部已偏離正規，違反貿發局的法定功能，與民爭利，蠶食同業的市場，而政府及貿發局對促進本港會議展覽業皆缺乏明確計劃。香港展覽會議協會要求政府全面檢討有關貿發局的政策；重新釐訂貿發局的角色和功能；明確指示貿發局積極促進本港會議展覽業的發展；私有化展覽服務部、外判展覽管理業務和加強與業內私營企業的合作。
7. 對於業界的指控，貿發局總裁施祖祥雖然不肯承認，卻明確承諾：「由於資源有限，若私營展覽公司所舉辦的展覽會能滿足市場需要，貿發局將不會舉辦同類展覽，以避免引起相關行業的惡性競爭」。
8. 可是，四年下來，施祖祥不僅沒有遵守諾言，繼續舉辦已有私營展覽商主辦的同類型展覽會，爭奪業界的市場，更變本加厲，主動出擊，企圖霸佔同業的市場，扼殺私營企業的生存空間。
9. 去年沙士肆虐，會議展覽業一如其他行業，備受衝擊。為了彌補每年定於四月由貿發局舉辦的家品及禮品展的損失，貿發局破例在七月舉辦了一個補充展。雖然業界為了顧全大局被迫勉強同意，但事實證明，由於偏離傳統市場智慧，補充展的成績只是強差人意，不單參展人數遠不及前年，實際的真正買家也不多，訂單普遍下跌二成，證明在七月舉辦有關展覽只屬沙士肆虐下的特殊應變產物，可一不可再。可是，貿發局竟然無視事實，以所謂「全球的採購趨勢已經改變」及「內地市場發展蓬勃，採購周期往往要結合內地的消費周期」為由，強行將去年的例外變成常規，決定由今年起，每年七月增辦多一個玩具、家品及禮品展，甚至為了爭奪市場，不惜割價推銷，以本傷人。貿發局的目的明顯不過，就是以惡性競爭的手法，蠶食同業的市場，矛頭直接指向建發國際於十月舉辦的同類型展覽會。

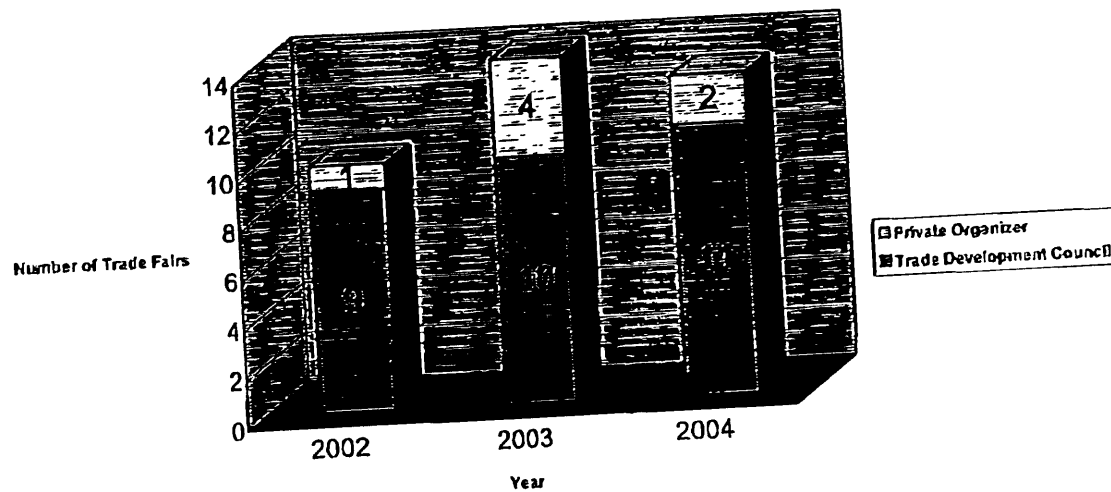
10. 其實，貿發局不僅在展覽業上排擠私營對手，在展覽會承辦業務上，亦愈來愈以壟斷姿態霸佔市場。十年前，貿發局已說服政府撥款四千萬元在元朗興建「展覽服務中心」，近年在業界人士強烈反對下，貿發局又以提高展台質素為由，在將軍澳建造比元朗舊址大三倍、全港規模最大的「營運中心」，企圖提供一條龍服務，壟斷市場，令私營展覽會主辦商、攤位承辦商和其他相關服務供應商的市場佔有率不斷下降，構成惡性競爭。
11. 貿發局偏離正規，不務正業，與民爭利，是鐵一般的事實，不但違反原來成立的目的，背離應有的角色，更與行政長官董建華先生在施政報告和財政司司長唐英年先生在預算案內提出的「大市場、小政府」政策完全背道而馳。須知道，「大市場、小政府」哲學的真諦正在於佔用社會資源的政府和公營機構應逐漸撤離市場、盡量減少參與市場活動，以便讓私營企業可以有更大市場發展空間，從而達致真正改善營商環境的目的。「大市場、小政府」政策不等於公營部門私營化，因為由公帑資助的公營機構奉行市場導向政策，只會令它們佔用更多社會資源，對私營機構構成更大壓力，造成惡性競爭，甚至可能完全扼殺後者的生存空間。
12. 作為由公帑資助的法定機構，貿發局每年由政府獲得的撥款接近四億元。過去十年來，政府用報關費津貼貿發局的撥款明顯減少，由九三年至九四年度的五億七千三百一十萬下降至二〇〇二至〇三年度的三億七千四百三十萬元，但同期貿發局來自展覽會的收益卻由三億一千二百七十萬增加至七億零六百九十萬元，佔貿發局全年收入 46.3%，而由二〇〇〇年二〇〇三年，貿發局每年平均盈利約一億一千一百萬元，可見展覽會業務的收入不單已成為貿發局的主要收入來源，更為貿發局帶來可觀的盈利。
13. 我們認為，貿發局的市場導向政策，實行自負盈虧，表面講求經濟效率，實質卻倒果為因，手段已成為目的，在不知不覺間，貿發局不僅已蛻變成為名副其實的既得利益集團，違反了原來成立的目的，背離了所應扮演的角色，發揮不到應有的功能，更反客為主，變本加厲，以惡性和不公平的競爭手法，與民爭利，吞噬私營企業的市場，扼殺私營展覽商的生存空間。
14. 作為促進本港出口貿易的法定機構，貿發局舉辦展覽會的首要目標，不在牟利，而在協助推廣出口行業，因此不應與提供相同服務的私營企業爭奪市場，更遑論處心積慮打擊和排擠對手，扼殺私營企業之生機了。
15. 我們鄭重要求特區政府正視會議展覽業面對的困境、檢討貿發局的功能、重新釐訂貿發局的角色、貫徹「大市場、小政府」政策，從而推亂反正，改善業界之營商環境，確保本港會議展覽業健康發展，茁壯成長。

Comparison on the number of trade fairs held by TDC and private organizer from 2002 - 2004.

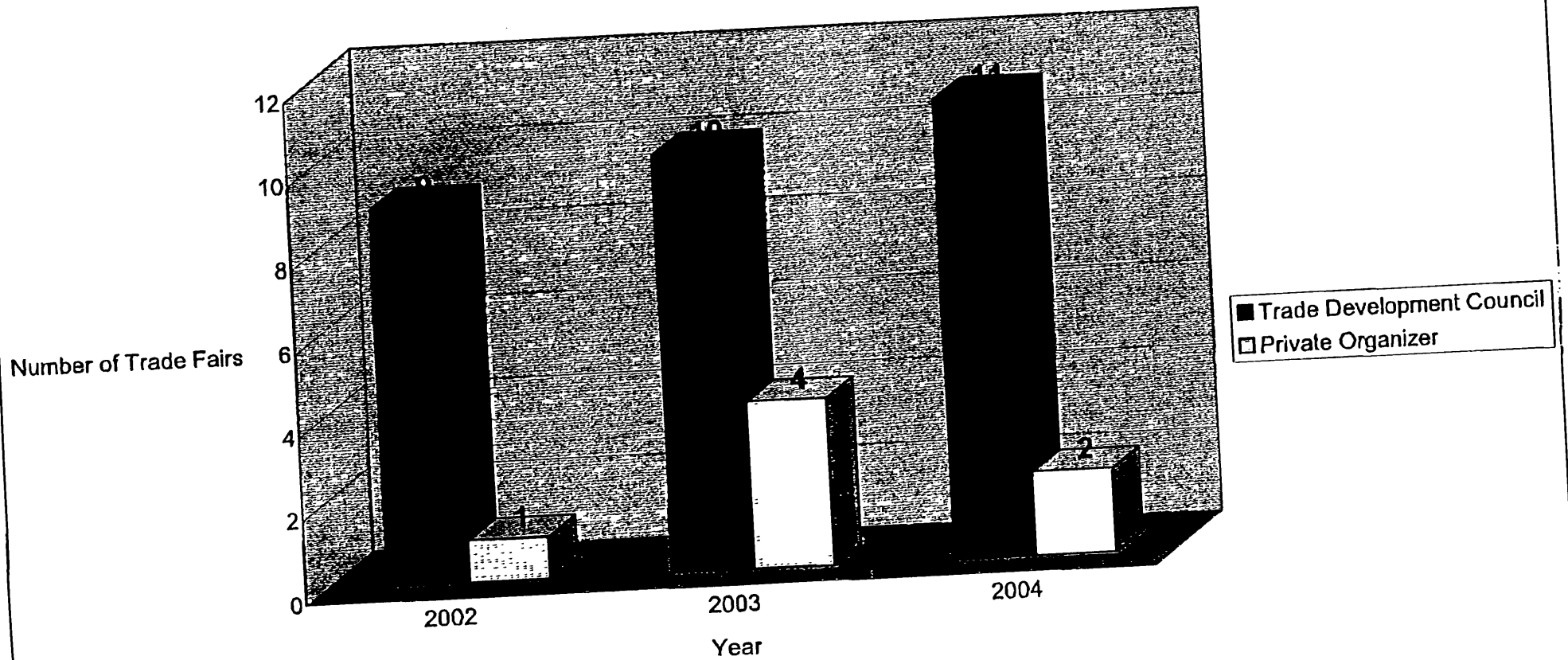
Organizer / Year	2002	2003	2004
Trade Development Council	9 (90%)	10 (71.43%)	11 (84.16%)
Private Organizer	1 (10%)	4 (28.57%)	2 (15.38%)

Remark: This research only includes trade fairs that occupies 3 halls or more at HKCEC.

Number of Trade Shows held by TDC & Private Organizer from 2002-2004



# Comparison on Number of Trade Shows by TDC & Private Organizer from 2002-2004



## Trade fairs for light industry products in Hong Kong Convention &amp; Exhibition Centre in 2002

Month	Event Name	Event Nature	Organizer
January	Hong Kong Toys & Games Fair 2002	Trade	Trade Development Council
	Hong Kong International Stationery Fair 2002	Trade	Trade Development Council
March	Hong Kong International Jewellery Show 2002	Trade	Trade Development Council
April	Hong Kong Houseware Fair 2002	Trade	Trade Development Council
	Hong Kong Gifts & Premium Fair 2002	Trade	Trade Development Council
September	Hong Kong Watch & Clock Fair 2002	Trade	TDC / Munich Int'l Trade Fairs Pte. Ltd.
October	electronicAsia 2002	Trade	Trade Development Council
	Hong Kong Electronics Fair 2002	Trade	Kenfair International Limited
	11th HK Int'l Toys & Gifts Show / 10th Asian Gifts, Premium & Household Products Show	Trade	Trade Development Council
	Hong Kong International Lighting Fair 2002	Trade	Trade Development Council

Number of Trade Fairs Organized by Trade Development Council : 9 (Percentage: 90%)

Number of Trade Fairs Organized by Private Organizer : 1 (Percentage: 10%)

Total Number of Trade Fairs : 10

Remark: This research only includes trade fairs which occupied 3 halls or more at Hong Kong Convention & Exhibition Centre.

Trade fairs for light industry products in Hong Kong Convention & Exhibition Centre in 2003

Month	Event Name	Event Nature	Organizer
January	Hong Kong Toys & Games Fair 2003	Trade	Trade Development Council
	Hong Kong International Stationery Fair 2003	Trade	Trade Development Council
	Hong Kong Fashion Week for Fall / Winter 2003	Trade	Trade Development Council
March	Hong Kong International Jewellery Show 2003	Trade	Trade Development Council
April	Hong Kong Houseware, Gifts & Premium Fair 2003	Trade	CMP Asia Limited
June	June Asia's Fashion Jewellery & Accessories Fair 2003	Trade	Trade Development Council
July	Hong Kong Gifts & Premium Fair & Hong Kong Houseware Fair 2003 (Part 2)	Trade	Trade Development Council
September	Hong Kong Watch & Clock Fair 2003	Trade	CMP Asia Limited
	September Asia's Fashion Jewellery & Accessories Fair 2003	Trade	CMP Asia Limited
	September Hong Kong Jewellery & Watch Fair 2003	Trade	TDC/ Munich Int'l Trade Fairs Pte. Ltd.
October	electronicAsia 2003	Trade	Trade Development Council
	Hong Kong Electronic Fair 2003	Trade	Kenfair International Limited
	12th HK Int'l Toys & Gifts Show / 11th Asian Gifts, Premium & Household Products Show	Trade	Trade Development Council
	Hong Kong International Lighting Fair 2003	Trade	Trade Development Council

Number of Trade Fairs Organized by Trade Development Council : 10 (71.43%)

Number of Trade Fairs Organized by Private Organizer : 4 (28.57%)

Total Number of Trade Fairs : 14 (100%)

Remark: This research only includes trade fairs which occupied 3 halls or more at Hong Kong Convention & Exhibition Centre.



**Trade fairs for light industry products in Hong Kong Convention & Exhibition Centre in 2004**

Month	Event Name	Event Nature	Organizer
January	Hong Kong Toys & Games Fair 2004	Trade	Trade Development Council
	Hong Kong International Stationery Fair 2004	Trade	Trade Development Council
March	Hong Kong International Jewellery Show 2004	Trade	Trade Development Council
April	Hong Kong Gifts & Premium Fair 2004	Trade	Trade Development Council
	Hong Kong Houseware Fair 2004	Trade	Trade Development Council
	Hong Kong Electronics Fair (Spring) 2004	Trade	Trade Development Council
July	Summer Sourcing Show for Gifts, Houseware & Toys 2004	Trade	Trade Development Council
September	Hong Kong Watch & Clock Fair 2003	Trade	Trade Development Council
	September Hong Kong Jewellery & Watch Fair 2004	Trade	CMP Asia Limited
October	electronicAsia	Trade	TDC / Munich Int'l Trade Fairs Pte. Ltd.
	Hong Kong Electronics Fair 2004	Trade	Trade Development Council
	13th HK Int'l Toys & Gifts Show and 12nd Asian Gifts, Premium & Household Products Show	Trade	Kenfair International Limited
	Hong Kong International Lighting Fair 2004	Trade	Trade Development Council

Number of Trade Fairs Organized by Trade Development Council : 11 (84.16%)

Number of Trade Fairs Organized by Private Organizer : 2 (15.38%)

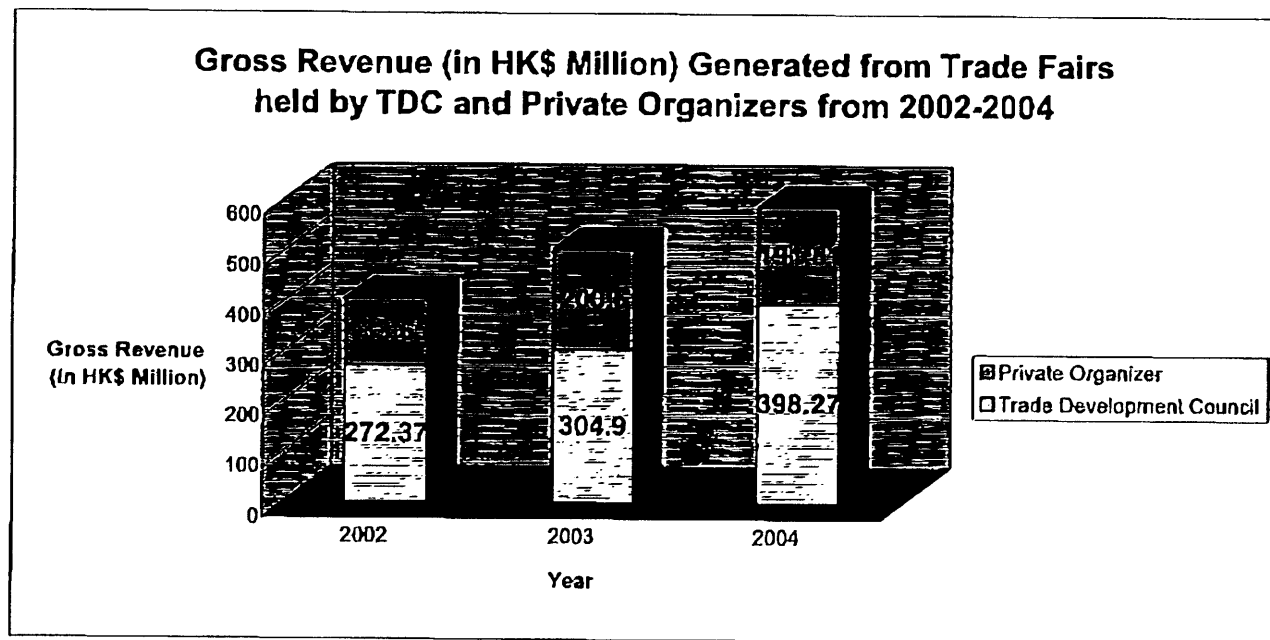
Total Number of Trade Fairs : 13 (100%)

Remark: This research only includes trade fairs occupying 3 halls or more at Hong Kong Convention & Exhibition Centre.

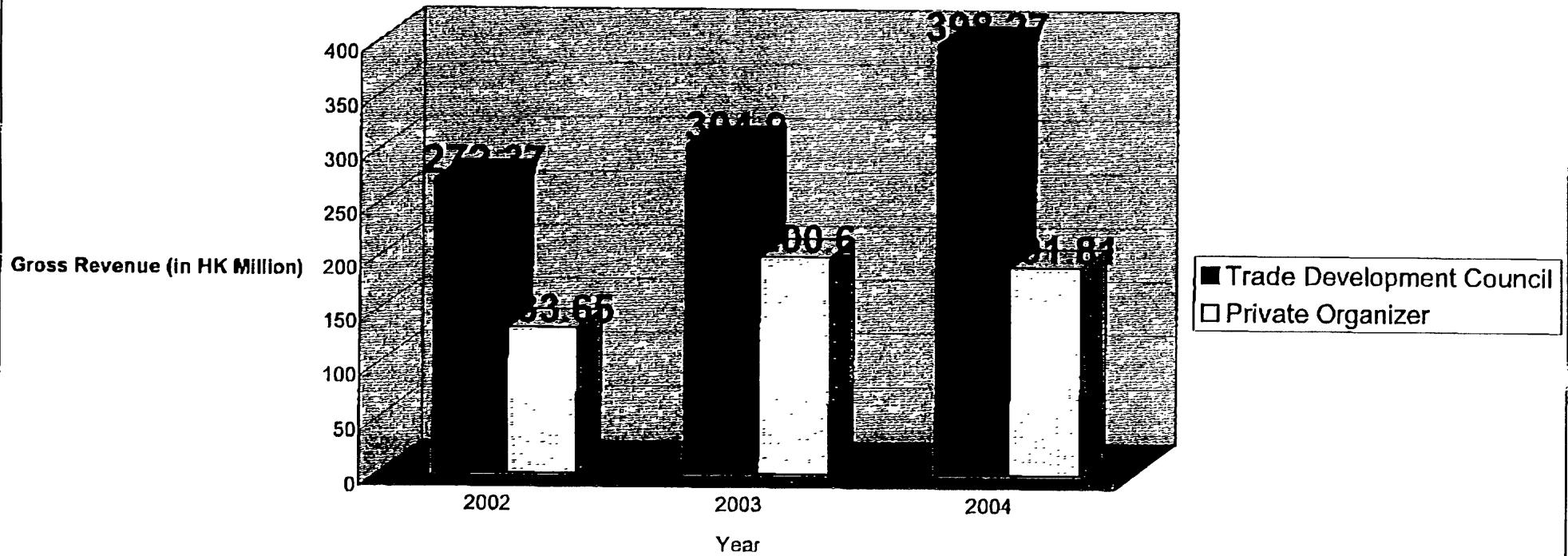
Comparison on the gross revenue (in HK\$ million) generated from trade fairs held by TDC and private organizer from 2002 - 2004.

Organizer / Year	2002	2003	2004
Trade Development Council	HK\$272.37 (67.08%)	HK\$304.9 (60.32%)	HK\$398.27 (67.49%)
Private Organizer	HK\$133.65 (32.92%)	HK\$200.6 (39.68%)	HK\$191.81 (32.51%)

Remark: This research only includes trade fairs that occupies 3 halls or more at HKCEC.



# Gross Revenue (in HK\$ Million) Generated from Trade Fairs by TDC and Private Organizers from 2002-2004



KENFAIR INT'L LTD 852 2311 6667

**Gross revenue of trade fairs for light industry products in HKCEC in 2002**

Organizer	Event Name	Total no. of exhibitors	Gross Revenue (in HK\$)
TDC	Hong Kong Toys & Games Fair 2002	1600	41,314,000
	Hong Kong International Stationery Fair 2002	150	3,885,000
	Hong Kong International Jewellery Show 2002	880	18,876,000
	Hong Kong Houseware Fair 2002	1800	46,475,000
	Hong Kong Gifts & Premium Fair 2002	2560	66,102,000
	Hong Kong Watch & Clock Fair 2002	720	19,152,000
	electronicAsia 2002	540	16,149,000
	Hong Kong Electronics Fair 2002	1720	49,264,000
	Hong Kong International Lighting Fair 2002	432	11,155,000
Private Organizer	11th HK Int'l Toys & Gifts Show / 10th Asian Gifts, Premium & Household Products Show	4500	133,650,000

Gross Revenue to Trade Development Council : HK\$272,372,000 or HK\$272.37 million (Percentage: 67.08%)  
 Gross Revenue to Private Organizer : HK\$133,650,000 or HK\$133.65 million (Percentage: 32.92%)  
 Total Gross Revenue : HK\$406,022,000 or HK\$406.02 million (Percentage: 100%)

Remark: This research only includes trade fairs which occupied 3 halls or more at Hong Kong Convention & Exhibition Centre.

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**Gross revenue of trade fairs for light industry products in HKCEC In 2003**

Organizer	Event Name	Total no. of exhibitors	Gross Revenue (in HK\$)
TDC	Hong Kong Toys & Games Fair 2003	1702	43,947,000
	Hong Kong International Stationery Fair 2003	200	5,180,000
	Hong Kong Fashion Week for Fall / Winter 2003	920	25,123,000
	Hong Kong International Jewellery Show 2003	1186	25,440,000
	Summer Sourcing Show for Gifts, Houseware & Toys	3790	97,862,000
	Hong Kong Watch & Clock Fair 2003	720	19,152,000
	electronicAsia 2003	548	16,328,000
	Hong Kong Electronics Fair 2003	1980	56,138,000
	Hong Kong International Lighting Fair 2003	609	15,725,000
Private Organizer	June Asia's Fashion Jewellery & Accessories Fair 2003	220	5,297,000
	September Asia's Fashion Jewellery & Accessories Fair 2003	152	3,660,000
	September Hong Kong Jewellery & Watch Fair 2003	1793	50,851,000
	12th HK Int'l Toys & Gifts Show / 11th Asian Gifts, Premium & Household Products Show	4600	140,760,000

Gross Revenue to Trade Development Council : HK\$304,695,000 or 304.9 million (60.32%)

Gross Revenue to Private Organizer : HK\$200,568,000 or 200.6 million (39.68%)

Total Gross Revenue : HK\$505,463,000 or HK\$505.5 million

Remark: This research only includes trade fairs which occupied 3 halls or more at Hong Kong Convention & Exhibition Centre.

## Gross revenue of trade fairs for light industry products in HKCEC in 2004

Organizer	Event Name	Total no of exhibitors	Gross Revenue (in HK\$)
TDC	Hong Kong Toys & Games Fair 2004	1807	46,659,000
	Hong Kong International Stationery Fair 2004	221	5,724,000
	Hong Kong International Jewellery Show 2004	1380	29,601,000
	Hong Kong Gifts & Premium Fair 2004	3440	88,824,000
	Hong Kong Houseware Fair 2004	2060	53,191,000
	Hong Kong Electronics Fair (Spring) 2004	1480	37,699,000
	Summer Sourcing Show for Gifts, Houseware & Toys 2004	1000	25,821,000
	Hong Kong Watch & Clock Fair 2003	720	19,152,000
	electronicAsia	552	16,508,000
	Hong Kong Electronics Fair 2004	1950	55,852,000
Private Organizer	Hong Kong International Lighting Fair 2004	745	19,237,000
	September Hong Kong Jewellery & Watch Fair 2004	1800	51,050,000
	13th HK Int'l Toys & Gifts Show and 12nd Asian Gifts, Premium & Household Products Show	4600	140,760,000

Gross Revenue to Trade Development Council : HK\$398,268,000 or HK\$398.27 million (Percentage: 67.49%)

Gross Revenue to Private Organizer : HK\$191,810,000 or HK\$191.81 million (Percentage: 32.51%)

Total Gross Revenue : HK\$590,078,000 or HK\$590.08 million (Percentage: 100%)

Remark: This research only includes trade fairs occupying 3 halls or more at Hong Kong Convention & Exhibition Centre.



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City University  
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管理科學系  
Department of  
Management Sciences

The Hon Kenneth Ting Woo-shou, JP  
Chairman  
Panel on Commerce & Industry  
Legislative Council  
Legislative Council Building  
8 Jackson Road  
Central  
Hong Kong

7 April 2004

**RE: Complaint against TDC's conflict with public interest**

Dear Mr Ting,

I am writing to express my dissatisfaction with the conflicting roles of our key trade promoter, Trade Development Council ("TDC"), and their recent actions that exemplify this conflict. My arguments are as follows:

1. Since Hong Kong was developed as an entrepot by the British 160 years ago, the government has been adopting a free trade policy. This economic policy has proven to be successful, and the less governmental interference there is, the better and more rapid the economic development. After the handover of Hong Kong's sovereignty to The People's Republic of China on 1 July 1997, the Basic Law stated clearly that the HKSAR government should not impose any restrictions on the economic activities of the private sector or any activities that may threaten Hong Kong's economy.
2. With reference to Section 4 of the Hong Kong Trade Development Council Ordinance (Cap. 1114), TDC was set up by the government in 1966 to perform the following functions:
  - i) to promote, assist and develop Hong Kong's trade with places outside Hong Kong, with particular reference to exports; and
  - ii) to make such recommendations to the government as it sees fit in relation to any measures which it considers would achieve an increase in Hong Kong's trade.

Since 1970, the TDC has organized many mega-scale exhibitions for various industries, covering a wide range of specialized trade exhibitions for Hong Kong's major manufacturing and service sectors. The Council's achievements are significant – Hong Kong's export and trading activities were effectively promoted through world-class trade exhibitions. Taking the economies of scale into consideration and the proven capability of Hong Kong's private exhibition organizers in organizing trade events, TDC should thus share their right to organize exhibitions with the established and reputable exhibition organizers, refocusing the public resources (government subsidies) on the appropriate arenas to explore the export market for the industries under-represented on the global front.

3. There are a number of major trade exhibitions with similar themes that are concurrently organized by both TDC and private organizers. In view of the well-established scale and history of the trade shows organized by TDC over the past decade, we suggest that TDC sharing its exclusive right to organize trade events with private organizers, better utilizing the public resources and avoid wastage. And more importantly, given the successful trade shows organized by these private organizers, TDC is not supposed to compete with them and make profits on the same exhibition theme, as promoting Hong Kong's exports rather than making a profit is the first and foremost consideration of TDC in organizing exhibitions. TDC's development over the past few years is somehow conflicting with its statutory role as a public tool to promote Hong Kong's trade.
4. On behalf of Kenfair International (Holdings) Limited, I initiated a study involving a survey on Trade Exhibition Industry in Hong Kong in September 2003, with particular focus on the role and functions of TDC. The study originated from the public announcement that TDC will organize the "July Show" in 2004 (a similar show was held in July 2003 to replace the April Show which was postponed due to SARS), which will be held as an annual event. The findings indicated that TDC is unquestionably the largest industry player with a dominating role in Hong Kong's trade exhibition market.

Taking the Hong Kong International Toys & Gift Show, and Asian Gifts Premium and Household Products Show organized in every October by Kenfair International (Holdings) Limited as an example, majority of the exhibitors participated both April as well. This clearly demonstrates the overlapping resources dedicated in the logistic arrangement and coordination. Taking the participation ratio as a reference, the October Shows in 2002 attracted 58,000 visitors and 4,600 booths; while the April Show in 2002 attracted similar participants number. The comparable results prove that private organizers are capable to organize mega-scale trade shows and it is unnecessary to devote additional resources for the same effect.

I earnestly hope that the Legislative Council will take note of my view, and review the suitability of the existing TDC Ordinance to today's circumstances as well as the performance of the TDC in discharging their statutory duties.

Yours truly,



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