

We welcome the Government's policy to provide free choice to light bus owners and operators to switch to cleaner alternative fuel models and using a financial incentive initiative to expedite the replacement. However, we also opine that the incentive scheme as proposed is inadequate, incomplete and unfair in certain respects:

1. Electric vehicle is a zero-emission vehicle and is so far the most environmentally friendly vehicle in terms of roadside air pollution. In most developed countries where the use of clean vehicles is promoted, electric vehicles are regarded as the cleanest and are categorized as zero-emission as against other clean vehicles which are classified as ultra-low emission (ULEV) or low emission (LEV). Different category enjoys a different level of incentive and invariably the zero emission class entitles to the comparatively biggest incentive. This rationale is not apparent in the proposed incentive scheme. We suggest that the license fee for electric light buses shall be exempted as a token.
2. While the basis of how the HKD60,000 and HKD80,000 granted was arrived is not presented for our comment, the small difference between the two does not reflect the actual cost difference of the two types of vehicles. Electronic vehicle is approximately 18% (\cong HKD70,000) more expensive than LPG, the small difference actually has a deterring effect in deploying electric light buses.
3. The Government has spent a huge amount of money to promote the use of LPG re-fuelling infrastructure as well as tax exemption on LPG fuel, equivalent measures is not shown in providing the necessary infrastructure for the use of electric light buses. Our company has taken the initiative to build public light bus passenger shelters incorporating recharging facilities at our cost to provide the basic infrastructure. This is so far only applicable for green minibuses which have designated terminals. The use of electric vehicles as red minibuses and private light buses is met with an immediate infrastructure problem. We request the Government to provide land at strategic locations where we can build recharging stations for public use. In other countries, such as USA and France, the Government works together with the utility companies to build recharging station and provide free rechargings to EV users.

4. We suggest other than using purely financial initiatives to promote the use of the cleanest light buses, the following measures shall be considered:
 - 4.1 allowing more seats on electric light buses
 - 4.2 designate some specific routes, e.g. alongside or within some enlarged pedestrianized areas, only electric light buses are to be used for shuttling.
5. Our company has the capability to build up to 5 recharging stations per month currently with a further mobilization period of 3 months, would be able to build up to 20 stations a month.
6. The production capacity for electric light bus is 20 units a month and scale up to 50 units a month in 8 months time.
7. As the shelters/recharging stations and electric light buses are all built in Hong Kong, we will be able to provide up to 1,200 job opportunities, all at our cost.