

Consumer Council
Submission to LegCo Panel on Commerce and Industry
on the Proposal to Require Mandatory Registration and Labelling of the
Contents of Volatile Organic Compounds (VOC) in Specified Products

1. The Consumer Council welcomes the opportunity to provide its views to the LegCo Panel on Commerce and Industry regarding the consultation paper issued by the Environment, Transport and Works Bureau (ETWB) on a '*Proposed Scheme to Require Mandatory Registration and Labelling of the Contents of Volatile Organic Compounds in Specified Products*'.

2. The Council fully supports the Government's policy objective of improving the environment and human health through reducing VOC emissions in Hong Kong. In order to ensure that the implementation process of the proposed scheme is viable and manageable to the economy as a whole, the Council is of the view that

- the regulation of consumer products could be prioritized according to their respective contribution to the total VOC emissions as products with higher VOC content would have higher potential for achieving the objective of reducing VOC emissions in Hong Kong;
- it may be necessary to prescribe the labelling requirement and VOC content limits for consumer products with high-VOC contents;
- the regulation of other consumer products with lower VOC emissions could be implemented at a later stage, subject to the effectiveness of VOC emissions reduction involving products with high-VOC contents.

3. With regard to the practicality of the proposed registration and labelling scheme, the Council has suggestions on the following aspects for further deliberation of the Government.

- (i) Coverage of the regulatory scheme – it may be necessary to establish selection criteria for prioritizing product categories to be covered in the selection of consumer products to be targeted for VOC emission reductions, for reason that some products without or of low VOC contents might not significantly help to achieve VOC reduction goals.
- (ii) Effectiveness of the labeling requirement – the success of reducing VOC emissions by means of a labeling scheme depends on whether it can bring about a change in the purchasing behaviour of consumers. It is therefore necessary to enhance the level of public awareness about environmental impacts of VOCs and generate active consumer interest in changing their purchasing behaviour.
- (iii) Economic effects of the scheme – the cost effectiveness of the regulatory requirement and a competitive market are important safeguards against onerous costs being passed on to consumers.

4. The Council believes that the success of a policy requires not only drafting of a good regulation but also public consensus on the way forward. This requires all stakeholders from manufacturers to consumers to have a proper understanding of their respective responsibility and to play their part. The Government should actively assist or encourage all stakeholders to play their part.

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