

**Consolidated comments on the proposed mandatory registration and labelling scheme on VOCs**

**Panel on Commerce and Industry, 14 December 2004**

<b><u>Comments by Legislative Council Members and trade representatives</u></b>	<b><u>Administration's reponse</u></b>
1. Government's determination to resolve air pollution problem is supported.	We will strive to improve air quality by all means.
2. The role and relative importance of VOC in causing air pollution is questionable.	This has been thoroughly discussed in Chapter 3 of the 2002 Joint Study on PRD Region Air Quality.*
3. The labelling approach with reliance on consumer choice is ineffective in achieving the desired reduction in VOC emissions.	We will supplement the scheme with publicity campaign; civic education has been proven effective in many areas, e.g. Clean Hong Kong.
4. Every citizen has to share the responsibility for reducing air pollution, and consumers have to the right to be informed.	Agreed.
5. The requirement for labelling of VOC contents would be difficult to comply since most products are produced by overseas manufacturers, who would not be willing to provide the information to local suppliers.	We believe that manufacturers should have full knowledge to their product information; the scheme does not require full disclosure of commercially sensitive formulae but only total VOC contents.

\* The Joint Study is available at [http://www.epd.gov.hk/epd/english/environmentinhk/air/studyrrpts/files/final\\_rept.pdf](http://www.epd.gov.hk/epd/english/environmentinhk/air/studyrrpts/files/final_rept.pdf)

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6. The registration procedure and in particular the testing requirement would impose exorbitant costs on suppliers and cause delay to the marketing of products.	We note this concern and will make necessary and appropriate refinements to the scheme.
7. Many SMEs would be driven out of business because of resources constraint; consumer choices would also be restricted due to disappearance of some products that cannot comply with the regulation.	Noted.
8. The Government should consider prioritizing the products to be regulated as according to their relative contribution to total VOC emissions, instead of imposing disproportionately severe requirements on small emission sources.	While we would carefully consider the cost-effectiveness of every regulatory measures, we also need to maintain the fairness of the regulatory scheme.
9. There is not sufficient consultation.	The Administration has held many consultation sessions and also attended the trades' consultation forums. We have met nearly a hundred of groups, representatives and companies. Over a thousand submissions have been received.
10. It would be too hasty to introduce the regulation by 2005.	LegCo, green groups as well as ordinary citizens have all urged the Government to take more drastic control on air pollution; there is also the need to meet the 2010 consensus reached with Guangdong.

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11. The proposed 6-month grace period is not enough and the proposed penalty is too heavy.	We will work out closely with the trade on the grace period and ensure that the penalty will be commensurate with the seriousness of the offence.
12. The Government should conduct a proper regulatory impact assessment on the scheme.	The Administration would revisit the need for a regulatory impact assessment after further work on the proposal in consultation with the trade.

**Environment, Transport and Works Bureau**  
**January 2005**