



Ms Linda W P Ho, CEO, Green Council

Green Council fully support the HKSAR Government in launching the Air Pollution Control (Volatile Organic Compounds) Regulation (hereafter “APC (VOC) Regulation”) to control VOC emissions from selected products.

As the manager and operator of the Hong Kong Green Label Scheme (HKGLS), which includes product certification and labeling against environmental leadership criteria for paints, Green Council have been involved in over two years of frequent communications and negotiations with local paint manufacturers and suppliers in converting their products into more environmentally preferable ones, in particular, in terms of VOCs content. We consider that our experience in VOCs control in paints enables us to provide useful insights and recommendations. To show support to the new regulation, Green Council will include the relevant requirement into the HKGLS. Having reviewed the APC (VOC) Regulation, we have the following general and specific comments and suggestions to increase its relevance, scope, impact and effectiveness:

GENERAL COMMENTS

To enhance both public and industry acceptance and participation, the scope of the consultation for this regulation should be expanded to also include major users of items to be regulated, e.g. government departments, developers, etc..

According to the Hong Kong Air Pollutant Emission Inventory for Non-methane VOCs (NMVOCs) prepared by EPD s, apart from the paint, consumer and printing industry sectors (which together accounted for 32,500 tonnes of NMVOCs in 2005), other key NMVOCs sources include vehicles (6,500 tonnes in 2005), electricity generation (409 tonnes in 2005), civil aviation (418 tonnes in 2005) and marine navigation (303 tonnes in 2006). In this regard, the Regulation should also target and apply controls to these other sources of VOCs in order to reduce overall VOCs.

The APC (VOC) Regulation only addressed chemical content and does not actually examine the chemical emission of products at this stage. By taking the step further to regulate chemical emissions from finished products, it would create a very comprehensive piece of legislation in protecting the air quality. As an example, the HKGLS Standard for Floor Materials (GL-008-002) has included criteria for the discharge of VOCs and emissions from formaldehyde.

Apart from the items currently covered by the APC (VOCs) Regulation, other VOCs-containing products should also be addressed, including:

- cosmetics, fragrances and personal care products;
- construction materials (e.g. adhesives, wooden panels, wallpaper, carpets etc.);
and
- cleaning products and disinfectants.

As a common practice, such as other ecolabelling scheme around the world, to categorize paints into water-based and solvent-based types. Within such, both water and solvent based can be subdivided into interior and exterior application. Different VOCs limits should be set under different subcategories of paints instead of merging into one maximum limit of VOCs content.

SPECIFIC COMMENTS

Part 2 - Prohibitions and Requirements Relating to the Volatile Organic Compound Content of Regulated Paints

3. Prohibition on manufacture and import: regulated paints

There should be a supplemental mechanism created and inserted to further restrict the VOCs content of the forty-one (41) paint products listed under Parts 2, 3 and 4 of Schedule 1.

The maximum VOCs content levels allowed should factor in any performance requirements recommendations for the paint products. Apart from the dilution ratio, application method(s) should be taken into consideration, as some products might require several applications in order to achieve appropriate/desired performance levels. In this regard, a formula may need to be developed to calculate the “actual/practical” VOCs content of the product volumes required to achieve satisfactory performance.

6. Requirement for certain information to be displayed: regulated paints

In addition to expressing the VOCs content in g/L of coating, any performance requirements recommendation(s) (i.e. number of coatings that should be applied) along with its/their corresponding VOCs content/emission levels, should be included.

7. Requirement of product notification: regulated paints

Documentation to be submitted by manufacturers or importers to the Authority should include an independent laboratory test report establishing or confirming the claimed VOCs content of the paint products being marketed in Hong Kong.

VOCs content of the other raw materials (latex, pigments/ extenders/ colorants/ additives, latex free monomer, pH adjuster and low viscosity solvent) should also be included.

Total VOCs content of the paints, under recommended performance requirement conditions, should be added.

A simple claims auditing process, to investigate and confirm the authenticity of submitted product notifications, should be developed and implemented.

Part 3 - Prohibitions and Requirements Relating to the Volatile Organic Compound Content of Regulated Printing Inks

10. Prohibition on manufacture and import: regulated printing inks

There should be an additional mechanism to further restrict the VOCs content of the seven (7) types of printing inks listed under Parts 2 and 3 of Schedule 2.

Printing inks used only for coating purposes (e.g. gross vanishing, UV vanishing) should be referenced and addressed in Part 3 of the Regulation.

11. Requirement to submit a report: regulated printing inks

Documentation to be submitted by manufacturers or importers to the Authority should include an independent laboratory test report establishing or confirming the claimed VOCs content of the printing inks being marketed in Hong Kong.

A simple claims auditing process, to investigate and confirm the authenticity of submitted product notifications, should be developed and implemented.

Part 4 - Prohibitions and Requirements Relating to the Volatile Organic Compound Content of Regulated Consumer Products

13. Prohibition on manufacture and import: regulated consumer products

There should be a mechanism to further restrict the VOCs content of the six (6) types of consumer products listed under Parts 2, 3 and 4 of Schedule 3

The list of consumer product items in Schedule 3 should be routinely and regularly updated to include any and all new VOCs-containing products manufactured or imported.

14. Requirement to submit a report: regulated consumer products

Documentation to be submitted by manufacturers or importers to the Authority should include an independent laboratory test report establishing or confirming the claimed VOCs content of the consumer products being marketed in Hong Kong.

A simple claims auditing process, to investigate and confirm the authenticity of submitted product notifications, should be developed and implemented.

Part 5 – Requirement to Control Volatile Organic Compound Emission from Lithographic Heatset Web Printing Machines

16. Limits on volatile organic compound emissions from lithographic heatset web printing machines

The emissions control device should be capable of, and installed and operated to have 100% room capture.