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## Hong Kong Association for Testing, Inspection and Certification Limited

香港測檢認証協會有限公司

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Our Ref.:

Please quote this reference no in all replies

Your Ref.:

2006 December 27

Hon Audrey EU Yuet-mee,  
Chairman,  
Subcommittee on Air Pollution control (VOC) Regulations  
Legislative Council

Dear Ms. Eu,

Thank you for invitation our association to give comments on the draft air Pollution control (Volatile Organic Compounds) Regulation.

We support in principle the need to control and reduce the VOC contents in products in order to reduce the air pollution in Hong Kong.

However, our Association has strong reservation on the designating the registered professional engineer to be the "competent person" to certify the VOC for Lithographic headset web printing machine using the USEPA Method 18 "Measurement of Gaseous Organic Compound Emission by Gas Chromatograph" as specified in Part 5 Section 16. The reason being that the specified method involves chemical analysis of organic compounds using advanced chemical analytical instrumentation. The expertise required for the carrying out of this test method and the interpretation of the results are not normally encountered by registered professional engineer. Hence, it is recommended that the "competent person" designation should be altered to the HOKLAS accredited laboratories.

With best regards,

Yours sincerely,

Richard Fung  
Chairman