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**Comments on Consultation Paper – A Proposal to Ban Idling Vehicles with
Running Engines issued by Environment Bureau, HKSAR**

**Submitted by
The Conservancy Association
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1. CA welcomes the long-delayed proposal. The issue of banning idling engine has been discussed in the community for the last 7 years and even with the continuous efforts of NGOs to call upon voluntary actions of vehicle operators, there has been little progress in reducing exhaust emissions from idling engines.
2. The main problems of emissions of idling vehicles are the health implications to people who are exposed to roadside environment, in particular to those who work long periods by the roadside daily, for example, the newspaper sellers. The special topographical and form of urban environment of Hong Kong aggravate the health impact of idling vehicles. The tower building blocks by the roadside hinder the dispersion of the vehicle exhaust emissions which accumulate to unacceptable concentration levels (i.e., exceeding the air quality objectives). Compounded with high pedestrian flows in the urban areas of Hong Kong, the scale of threat to human health becomes acute.
3. It has been well researched and documented that exhaust emissions from vehicles are toxic and carcinogenic. Long term exposure to these emissions have a much higher charge of contracting breathing illnesses and even lung and other related cancers. While Government spends billions of dollars on providing medical care to combat these illnesses, CA is of an opinion that prevention is always better than cure. Any possibility to curb vehicle emissions should then be sought.
4. Idling vehicles with running engines usually support the air-conditioning while the drivers and passengers are waiting in the vehicles and thus provide comfortable in-cabinet cool environments which can be easily enjoyed in the nearby shops, malls and restaurants in Hong Kong. Thus most of the time, it is unnecessary.
5. As pointed out in the consultation paper, Hong Kong is not the first one seeking

measures to ban idling vehicles with running engines; many cities in the US, UK, Canada, Japan and Singapore have already had similar measures. In implementing this measure, these cities allow exemptions to certain types of vehicles in very special circumstances; nonetheless, providing cooling comfort is never an excuse for exemption.

6. CA agrees to provide exemption to vehicles of disciplinary forces, other emergency vehicles and vehicles which have their engines idling for genuine operational needs. No exemptions should be granted to other types of vehicles, in particular to commercial vehicles which simply keep the engines running for air-conditioning. The technology to keep an air conditioner running on battery power while the engine is off is already commercially available and applied in hybrid car models such as the Toyota Prius. Legislation to ban idling engines will quickly be followed with alternative and commercially viable solutions for powering air conditioners including refits of vehicles already in operation.
7. Government should however consider provide more shaded parking spaces. Planting more trees at taxi and PLB stands is certainly a good practice to cool down the temperature in these places in the summer.
8. CA strongly supports the overall control framework as laid out in paragraphs 6.1 and 6.2 of the consultation paper. The exemptions provided in paragraph 6.2 are reasonable and adequate. There should have no residual power of exemption. The ban should be applied throughout the territory in all times, including summer.
9. CA does not object to providing a grace period of 3 months for help drivers to get used to the new statutory requirement after the enactment of the relevant legislation.
10. For protecting the health of Hong Kong people, CA earnestly urges the Legislative Council to endorse this legislation as soon as possible.
11. Whilst we strongly support the early enactment and enforcement of this legislation, we would stress that banning idling vehicles is only one - and quite a small one - of the many efforts that is required to tackle pollution. To have the legislation passed is only one small part towards discharging their duties as government and lawmakers towards a better environment for Hong Kong. We continue to have high expectation of both the government and the legislature in taking drastic but much-needed actions to curb air pollution.