

**CIBSE HKB Comment on**

**“Ozone Layer Protection Regulation 2009”**

1. Agreed with the proposals/papers on the implications to ozone depletion and shall establish the regulations for ozone layer protection.
2. Our view - Global warming is rapidly approaching if not surpassing ozone depletion as a paramount environmental issue.
3. Decision based only on consideration of ozone depletion without considering the effect on global warming is not good for our planet.
4. Question raised to the SAR Government: - "Is the current replacement refrigerant for HCFC the final solution?" It is noted from other developed countries that they are not happy with energy performance of R-134a. While the refrigerant has no ozone depleting potential, it is not energy efficient and will add burden to the problem of global warming.
5. Suggest to also explore/reference to Leadership in Energy and Environmental Design (LEED), from US Green Building Council, assessment of environmental impact of refrigerant which has a more balanced approach in trying to take both global warming and ozone depletion factors into account.
6. We should raise this to our community although it is almost certain HK will have to abide with the phasing out of all HCFC by 2020.
7. Suggest the SAR Government to form an expert group to further investigate possible alternative for R-134a.