



CB(1) 540/08-09(06)

Ms. Audery Eu (Chair)  
Panel of Environmental Affairs  
Legislative Council

Dear Ms. Eu and Legislative Council Members,

Clear the Air is asking for absolutely no exemptions for the idling engines legislation to any particular vehicle or trade for the following reasons:

1. There is no valid reason why taxi's & minibuses should be exempt from idling engines legislation while waiting for passengers in a taxi stand for the following reasons:
  - a. It has been proven that turning on & off the engine does not harm the engine or air conditioning unit.
  - b. It has been proven that idling for more than 10 seconds uses more fuel and produces more CO<sub>2</sub> therefore polluting the environment, compared to restarting the engine. In other words, idling engines for more than 10 seconds will cause more wear and tear on the engine compared to starting and stopping the engine.
  - c. According to the Natural Resources Department of the Canadian Government, the engine should be turned off if you are idling for more than 60 seconds to save costs and the environment. The break-even point to offset any incremental maintenance costs is under 60 seconds. Money that is saved on extra fuel costs should offset any potential increase in maintenance costs.
  - d. For the hot summer months or when it rains, there are 3 recommendations; 1) Install a portable fan, Hong Kong taxi's in the 70s and 80s installed fans to cool driver and passengers. 2) Install auxiliary conditioning units that can run even when the engines are turned off, it can be proposed that the government subsidize all or part of this cost 3) Government to plant more trees and or provide more shaded areas for Taxi Stands.
  - e. The air you breathe inside the car is no better than the air outside, it is still the same polluted air. If taxi's or minibuses idle they are doing themselves and their passengers a disservice by circulating the pollutants caused by idling engines back into the car / minibus. This is especially a serious health risk for those drivers and passengers who have lung & respiratory problems, heart disease and those who are pregnant. It has just been proven by a study from Nanjing University that air pollutions can cause birth defects.



2. We invite the tour coach companies to find alternatives such as the following to protect their drivers and passengers and people of Hong Kong from further health risks:
  - a. Installation of fans along the interior of the coach that run off an auxiliary / separate unit to cool down passengers
  - b. Installation of auxiliary air conditioning unit, again we propose the Hong Kong government to help subsidize the cost of these auxiliary units.
  - c. Change their current practice of waiting for passengers while idling the engine to, parking the coach elsewhere when passengers are looking at the tourist sites, driver should turn off engine while parked and stay outside the coach, at a scheduled time, pick up all passengers at a designated spot. The government can help by providing shaded areas for passenger pick up at popular tourist locations.

Clear the Air urges the government to not give exemptions to Taxi's or Minibuses or Coaches or any other trades. This will mitigate the point of the law which is to reduce the current state of air pollution. Again we emphasize there is no valid reason why taxis, minibuses and coaches should be exempt, they will save more money, and protect the health of their drivers, passengers and the people of Hong Kong. In terms of investments in auxiliary air conditioning units we ask the government step up to the plate and seriously considering subsidizing these costs.

Once the law is passed, all drivers and passengers will adapt, just like they have adapted to the legislation on seatbelt and indoor smoking.

Clear The Air