



Mini Spotters

Hong Kong

www.minispot.org

Date: 29 May, 2010
To: LecCo Bills Committee Members:
Re: Motor Vehicle Idling (Fixed Penalty) Bill

Dear LegCo Members,

Mini Spotters has noticed four main flaws in the proposed law:

1. Vehicles that are not lawfully stopped or not legally parked are being granted exemptions, to sit in cool air con, running their engine while breaking the law.

Exemptions should only be granted to vehicles that are lawfully stopped, or legally parked.(see attached list of offences)

2. There is no consensus among turbo-charger manufacturers that ALL turbo-charged vehicles must idle for 3 minutes after stopping, UNDER ALL DRIVING CONDITIONS. In fact, there is no need to idling at all in normal city driving. The EPD is deliberately misrepresenting the manufacturer statements to LegCo.

Members should require the EPD to provide all the statements from all the manufacturers to see what is really being said. (examples in this submission, and a list of manufacturers)

3. Manufacturers are more concerned about health than the EPD. They recommend NO IDLING at all in areas that are not “well ventilated” to prevent carbon monoxide poisoning. Indoor Public Transport Interchanges are not well ventilated.

There should be no exemptions for indoor Public Transport Exchanges.

4. Drivers can simply refuse to talk with the traffic warden and drive away to avoid being issued a fixed penalty.

The law must allow the Police to get the name of the driver from the vehicle owner.

Regards,

Annelise Connell
Mini Spotters

Mini Spotters promotes environmental stewardship to ensure safer neighbourhoods and smarter transportation choices that enhance the economy, improve public health and promote social equity for the betterment of Hong Kong.

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1. Drivers illegally parked, or unlawfully stopped, getting an exemption

Examples:

Cap: 240 - FIXED PENALTY (CRIMINAL PROCEEDINGS) ORDINANCE

- Reg 14(6) Picking up/setting down passengers in restricted zone
- Reg 14(7) Loading/unloading goods in restricted zone
- Reg 59 Failing to comply with road markings
- Reg 35(2)(a) Public light bus driver not moving forward at public light bus stand

Cap: 237 - FIXED PENALTY (TRAFFIC CONTRAVENTIONS) ORDINANCE

Driver and tour guide sleeping in a bus illegally parked on the pavement

Sec 7: – Parking on pedestrian pavement

Cap: 374G - ROAD TRAFFIC (TRAFFIC CONTROL) REGULATIONS

Driver smoking on the pavement while passengers are on board the tour bus

Reg: 44 – Vacating vehicle without stopping the engine

Chapter: 374D - ROAD TRAFFIC (PUBLIC SERVICE VEHICLES) REGS

Idling taxi waiting outside Peak Tram, not in a taxi stand

Reg: 45 – Taxi stopped other than at a taxi stand

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2 & 3. Turbo-chargers - Actual Manufacturers Statement

Cummins Turbo Technologies (Website)

“Before shutting your engine down, let the turbocharger cool down.

When an engine runs at maximum power/high torque, the turbocharger is operating at very high temperatures and speeds.

Hot shut down can cause reduced service life which is avoidable by a minute or two of idling.

Most mobile equipment applications include an adequate cooling period during parking or mooring procedures”

Toyota Hiace (letter from local dealer)

“... according to the recommendation of Toyota Motor Corporation, Toyota Hiace with **diesel turbocharger engine is no need to require any idling time before switched off the engine under normal city driving**. Detailed information of the engine with turbocharger was indicated in the Owner’s Manual for customer’s easy reference.”

(Owner’s manual)

Driving conditions and required idling time

Normal City Driving

Idling time – not necessary

High speed driving – about 80 km/hr

Idling time – about 20 seconds

About 100 km/h

Idling time – about 1 minute

Steep mountain slopes or continued driving above 100 km/hr

Idling time – about 2 minutes

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Isuzu (letter from local dealer)

“our principle suggests the drivers not to keep the engine running in a place that is poorly ventilated since exhaust gases could be easily filled in such environment, and drivers could suffer carbon monoxide poisoning”

Environmental Protection Department (email to a diesel vehicle manufacturer)

Sent: 29 February 2008 11:06

Subject: Vehicles with turbo-chargers - do they require idling before parking?

Some users claim that for heavy-duty vehicles equipped with turbo-chargers, the engine may need to remain idle for a few minutes after stopping or parking.

On the other hand, some experts and vehicle manufacturers have advised that the idling practice is only a recommended good practice but is NOT a must. In particular, new models are equipped with timer, non-return valve, etc. and idling is definitely NOT required at all.

We would like to seek your advice below –

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List of Manufactures of Diesel Vehicles sold in Hong Kong

DAF Trucks N.V.
Ford-Werke GmbH
Hino Motors Ltd.
IRISBUS SPA
Isuzu Motors Ltd.
IVECO spa
Kia Motors Corporation
Land Rover
Volvo Commercial Vehicles Australia Pty.
Ltd.
Man Nutzfahrzeuge AG
Mazda Motors Corporation
Daimler AG
Mitsubishi Motors Corporation
Mitsubishi Fuso Truck and Bus
Corporation
Nissan Motor CO. Ltd.
Nissan Diesel Motor Co. Ltd.
ADAM OPEL GmbH
ADAM OPEL GmbH
PSA PEUGEOT-CITROEN
RENAULT s.a.s.
RENAULT V.I.
Saab Automobile AB
SCANIA CV AB
SSANGYONG MOTOR COMPANY

Suzuki Motor Corporation
Volkswagen AG
Volvo Truck Corporation
Volvo Bus Corporation
Toyota Motor Corporation
Xiamen King Long United Automotive
Industry Co., Ltd.
Renault V.I. -Renault Vehicles
Industries
M.A.N. Nutzfahrzeuge
Aktiengesellschaft
M.A.N. Nutzfahrzeuge
Aktiengesellschaft
Kinglong United Automotive Industry
(Suzhou) Co., Ltd.
Zhengzhou Yutong Bus Co., Ltd.
Renault V.I. -Renault Vehicles
Industries
Liaoning Huanghai Automobile Group
I/E Co., Ltd.
Chongqing Chuan Jiang Vehicle
Manufacturing Co., Ltd.
Alexander Dennis Limited
Anhui Ankai Automobile Co., Ltd.
Higer Bus Company Limited

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4. Driver refusing to give ID information, and driving away

The proposed idling law allows for the warden to issue the ticket to the windscreen of the car or to the driver. However, the warden needs to identify the driver. What if the driver locks himself in the car and does not open his door or window? The idling law is a contravention of civil law, not a traffic offence listed in the schedule such as careless driving, red light etc whereby a notice can be sent to the vehicle owner demanding the driver name within 21 days. Therefore, it is totally unenforceable – just lock your car door and the warden has to call the Police to come and arrest you for failing to give information. Meanwhile you just drive away.

End

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