



CB(1) 616/06-07(03)

香港化粧品同業協會
The Cosmetic & Perfumery Association of Hong Kong Ltd.

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Dec. 27, 2006

Dear Subcommittee Chairman Hon. Audrey Eu and members of the Subcommittee on "Air Pollution Control (Volatile Organic Compounds) Regulation" ,

Opinion on "Air Pollution Control (Volatile Organic Compounds) Regulation"

The Cosmetic & Perfumery Association of Hong Kong has over 100 corporate members. Over 70% of our members are Small-to-medium sized companies (SMEs). Our members are mainly cosmetic importer/exporters, wholesalers, retailers and beautician training schools. Our trade association is one of the major trade associations in cosmetic industry in Hong Kong.

The members of our trade association are part of the Hong Kong society. Hong Kong is our home. We have much concern on the deteriorating air quality in Hong Kong. We do support the Government to make efforts to clean up the sky. We do care for the future of our home.

I would like to draw to your attention that, however, cosmetic is not a major contributor of Volatile Organic Compound (VOC) and air pollution. Since year 2004, there are a number of media reports and information available to public on the source of air pollutants over HK sky. Hong Kong shares the air pollution problem with the Pearl River Delta Area. The industries and vehicles in the Delta Region generate most of the pollutants. It is reported that over 80% of the pollutants over HK sky is migrated from the north. One good example is that non-populated outlying islands in HK have recorded poor air quality.

Amongst the local generated VOC, the figure from Environmental Protection Department (EPD) shows that less than 1% of VOC is from cosmetic. It shows clearly that cosmetic is not a major cause of air pollution or VOC emission.

In the past years, our trade association has been communicating with HK EPD on their intention to adopt the form of VOC control on consumer products in US Federal Government and those of California State Government. With an impression that EPD



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insists on proceeding the inclusion of cosmetic into the scope of consumer products in the VOC regulation, our trade association has pointed out that Hair Spray is probably the only meaningful commodity to be regulated under the cosmetic catalog.

The major VOC ingredient in Hair Spray is edible alcohol, which acts as solvent to dissolve ingredients. Edible alcohol is non-toxic and is found in varies wine, liquor, beer and food.

Cosmetic industry is closely associated with tourism, salon services, hairdressing and retail industries. Cosmetic products are one of the major attractions to visitors who come to HK for shopping and sightseeing. We have to speak loud and clear that inclusion of Hair Spray into the scope of VOC regulation is has already made the industry difficult. Going beyond this scope will hurt the cosmetic industry and associated industries.

We would like to urge the HK Government to "hit the nail on its head", tackling the main source of air pollution source for effective control. Chasing after cosmetics, which is obviously not a major source of pollution, is wastage of time and effort and will have no measurable benefit to the quality of HK air.

In short, our trade association supports the Government to make measures to help the improvement of air quality. Our opinion is that the inclusion of Hair Spray into the scope of the VOC Regulation is not necessary.