

**Subcommittee on
Air Pollution Control (Volatile Organic Compounds)
(Amendment) Regulation 2009**

**List of follow-up actions arising from the discussion
at the meeting on 2 July 2009**

At the meeting on 2 July 2009, the Administration undertook to conduct further consultation with the trades related to vehicle refinishing paints. The Administration was requested to report the outcome of consultation to the Subcommittee and provide a detailed response to the following concerns raised at the meeting:

Standards to be adopted

1. The standards adopted by California Air Resources Board (CARB) in regulating VOC-containing products might not be applicable to the situation in Hong Kong. Suggestions were made to adopt the standards under the European Paint and Products Directive (the European PPD standards) or accepting both CARB and European PPD standards in light of the following –
 - (a) most vehicles in Hong Kong were manufactured and imported from Europe and Japan. The European PPD compliant products were available in the market at affordable prices;
 - (b) problems such as technical difficulties, color matching, limited supply, higher costs and lack of customer support services were envisaged in using paints adopting the CARB standard;
 - (c) European PPD VOC regulations would deliver better air quality compared to CARB regulations, since the latter had excluded 47 solvents in the calculation of the VOC level;
 - (d) CARB compliant paints generally contain high levels of acetone which had a very low flash point and would increase the risk of fire and explosion; and
 - (e) sophisticated methods were required to distinguish exempt and non-exempt solvents and measure the VOC content level of CARB regulated products which would make enforcement difficult and costly compared to the European PPD compliant products.

Compliant products

2. The supply and price of the compliant products were uncertain. The compatibility of the water-based paints with the solvent-based paints and color matching were also questionable. The Administration should work with manufacturers and suppliers to ensure that sufficient compliant materials and products would be made available in the market at affordable prices.
3. The Administration should increase public awareness of the compliant products available in the market.

Capital and operation costs

4. The capital cost for a typical vehicle repairing shop to replace its painting facility for using low-VOC water-based compliant paints was estimated to be between \$50,000 and \$100,000 per paint booth and as much as \$500,000 to \$1 million for bus suppliers, which were far more than the estimated cost of \$5,000 to \$30,000 as suggested by the Administration.
5. The Administration should consider providing financial support to small and medium vehicle repairing shops in meeting the capital cost required for equipment modifications in association with the switching to water-based paints lest these shops would be forced out of business resulting in increased unemployment.
6. The application of water-based products for colour coatings would require careful control of humidity and temperature in dust-free paint booths with large working area which would add extra cost to the daily operation of the vehicle repairing shops.

Training

7. The Administration should coordinate the relevant parties such as the Vocational Training Council to provide adequate training and technical support to the industry for conversion from solvent-based paints to water-based products.

Enforcement

8. Enforcement should be extended to end-users for more effective control.
9. At present, no laboratory was accredited under the Hong Kong Laboratory Accreditation Scheme to undertake tests for the VOC content of paint products in Hong Kong. A proper mechanism should be established to facilitate enforcement.

Consultation and date of implementation

10. The initial consultation with the trades related to vehicle refinishing paints was not thorough. As the Administration had agreed to conduct further consultation with the trade, the implementation timetable for vehicle refinishing paints should be reconsidered.
11. A lead time of around six months would be required for the industry to receive the required training on the application of water-based paints and retrofit the painting facility before implementing the proposed conversion.