

Ref No. 009-09-LEGCO-Idling

January 9, 2009

Legislative Council Secretariat  
3/F Citibank Tower  
3 Garden Road  
Central  
Hong Kong

Attn: Mrs. Mary Tang  
Clerk to the Panel on Environmental Affairs

Dear

**Green Council Submission on Proposal to Ban Idling Vehicles**

On behalf of the Green Council, I thank the Chairman of the Panel on Environmental Affairs for inviting my organization to provide written comments on this proposal. Recognized that the Environmental Protection Department aims at finalizing the proposal and introducing the new legislation for scrutiny by the Legislative Council and implementation in 2009, I am very pleased to submit the following comments and suggestions on behalf of my organization:

**General Comments**

Regardless of the finalized details of the ban and any other current or proposed measures to control curbside vehicular emissions, Government officials should continue to encourage the selection, purchasing and use of vehicles with improved energy efficiency and lower emissions.

### **Specific Comments & Suggestions – Exemption**

#### *I) Taxi (Paragraph No. 5)*

For the sake of reasonableness and fairness, we support an exemption for the first five taxis in a queue at a taxi stand. However, there needs to be a clear and practical definition formulated and applied regarding what is a “moving queue”. In this regard, our suggestion is that movement should be required on a frequent basis [versus sporadic or occasional bases].

In addition, the road signs and/or markings to outline the “exemption areas” should be situated before the ban takes effective in order to ensure that taxi drivers are aware of, comprehend and honour the meaning of these signs and markings.

#### *II) Green and Red Minibuses (Paragraphs No. 8 & 9)*

Clear road signs/markings in Minibus terminals should be installed to avoid potential disputes or confusion over “exemption areas”, especially in the case of the Red Minibuses.

#### *III) Commercial Vehicles (Paragraphs No. 11-13)*

In order to effectively implement the 3-in-60-minutes grace period, it is suggested to establish a database to record those vehicles that will have enjoyed three-minute grace periods during every 60 minutes intervals. When an enforcement agent will go near an idling vehicle, he/she will be able to ascertain whether the vehicle has enjoyed the 3-in-60-minutes grace period or not.

#### *IV) On-board Auxiliary Engines Vehicles (Annex point 6)*

For certain vehicles that require their engines to be running constantly for ancillary purposes (e.g. mobile concrete pump, refrigerator, etc.), special licensing for exemption from the ban should be devised, provided and required.

### **Other Comment**

#### *I) Enforcement Team*

If Traffic Wardens and/or Environmental Protection Department staff are going to be the only personnel authorized to enforce the ban, the enforcement may not be sufficient or effective. Therefore, we suggest developing and implementing a dedicated enforcement team work force with special uniforms and identification cards. As well, the Traffic Wardens and Police Force personnel should be empowered and directed to enforce the ban as and when feasible.

II) Level of fine

To enhance the severity of punishment, offending drivers should be penalized through the mandated deduction of driving offence points.

III) Implementation

In order to properly and effectively implement the new legislation in 2009, an extensive public promotion and awareness programme should be deployed to ensure that drivers understand and comply with the new legislation from the outset. Nevertheless, during the pre-determined transitional period, verbal warnings should be given to drivers to remind them of the ban and its actual official implementation date.

**For your information, the Green Council is a Hong Kong-based non-profit and charitable organization which was established in 2000 with the motto of “Conservation begins with Education”. Its mission is to promote, support and facilitate environmental consideration, conservation and management amongst local industries and the general public through various programs and educational/ awareness-raising initiatives. Of particular note, its officials have extensive experience and success in the field of environmentally preferable products/ services identification, certification, recognition and promotion.**

I hope the above comments and suggestions are useful for the Panel’s purposes including as input for any follow-up revision work and/or related initiatives.

Yours sincerely,

Linda W P Ho  
Chief Executive Officer

LH/pc