

**Submission to
Bills Committee on Motor Vehicle Idling (Fixed Penalty) Bill
Monday, 7 June 2010**

Introduction

The Environment Bureau (EB) is currently seeking to introduce legislation to restrict stationary motor vehicles from idling their engines when at rest - The Motor Vehicle Idling (Fixed Penalty) Bill. The purpose of the bill is to reduce toxic emissions that damage public health. Having made substantial provision in the bill for exemptions, especially for commercial goods vehicles that must run their engines to operate ancillary equipment (cement trucks, loading cranes etc) and queuing taxis, EB is under increasing pressure to extend the exemptions to other classes of vehicles, especially public buses and taxis, in order to allow air conditioners to keep running to improve the comfort of drivers and passengers.

Civic Exchange supports the concept of restricting idling engines for the purpose of protecting the public, drivers and passengers from the harmful effects of toxic emissions. The most notable contributors to these toxic emissions are ageing diesel buses and trucks. These emissions are especially concentrated in covered public transport interchanges where large numbers of people wait in a confined environment where many vehicles simultaneously idle their engines. Extensive idling in such conditions can only have a negative effect on the health of drivers, passengers, and the public.

Proposal to link idling concessions with reduced emissions

The discomfort to drivers and passengers caused by high temperatures and humidity, especially during the summer months, is also recognized. However, Civic Exchange does not believe that public health should be sacrificed for personal comfort, and makes the following proposal with this view in mind:

Concessions for increased idling times could be offered to franchised and non-franchised buses that comply with emissions standards equivalent to or better than those of a well-maintained Euro IV engine.

This will create an incentive for public transport operators to upgrade/retrofit their fleets faster because the sooner they meet the standard the longer they can idle the engine and the cooler and more comfortable the buses will be for their passengers and drivers.

At the same time reducing emissions from ageing vehicles as they are retrofitted or replaced with new vehicles will also substantially reduce both the toxic emissions currently produced by idling vehicles and the threat to the health of the drivers, passengers and the community.

Mechanics of the proposal

1. Franchised and non-franchised buses (heavy and light) with demonstrated Euro IV equivalent emissions or better may idle for up to five minutes, but anything more polluting may not.
2. All buses to be clearly labelled on all sides according to their level of emissions. The Euro engine standard is proposed.
3. Retrofitting older vehicles with catalytic converters and particle traps to meet the standard would also be acceptable upon proof of ability to meet the Euro IV standard.
4. The scheme should focus on buses because of the special case of many vehicles congregating and idling in confined spaces (such as covered public transport interchanges, tourist spots and schools).
5. The scheme, with same Euro IV emissions requirement, could also apply to trucks that must routinely queue and idle (e.g. at border crossings, container terminals, logistics centres, and landfills)
6. No exemptions are proposed for private cars.

Infrastructural and institutional arrangements

1. It would be necessary to develop a protocol to test, record and publish the emissions of buses and to design a labelling scheme for easy identification.
2. A scheme for accreditation of emissions monitors both for tracking individual buses (like the smoky vehicle test) and street level monitoring (the technology for this is proven and already being used in HK) would be required.
3. EPD already has an officer who is responsible for the catalytic converter/particle trap inventory.

Additional benefits

1. This scheme provides further support to the Environmental Protection Department's (EPD) efforts to encourage the fitting of catalytic converters and particle traps, that itself may lead to the creation of more green jobs.
2. Establishing a system for vehicle labelling would assist both the EPD and the trades to prepare for the introduction of low emission zones, which EPD has also proposed as one of the 19 measures to reduce emissions in the AQO consultation.

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