

July 22, 2013

Chairman and Members,

I represent the views of Designing Hong Kong, as well as Paul Zimmerman, the District Councillor for Pokfulam.

We fully support the Mandatory Fuel Switch for Ocean Going Vessels in Hong Kong Waters. We disagree with the plan to only ask for a switch at berth.

We urge the Government to push forward immediately with the mandatory switch to 0.1% when vessels enter Hong Kong Territories. Asking for the switch only at berth is too late. Pokfulam residents, our constituents, live along the world's busiest shipping channel. They want to see a 'low emission zone' for East Lamma Channel, to clean up the air in Pokfulam.

Hong Kong residents should not have to wait for a PRD-wide emission control areas or ECA, which would have all vessels switching to 0.1% as they approach the PRD region. For ocean going vessels (container ships, bulk carriers, cruise ships etc), all regulations and discussion for ECAs and fuel switching has already been for 0.1% sulphur.

The complaints from the industry over fuel availability for vessels that don't go to North America/Europe are false. Once Government has made the decision, suppliers will provide the fuel immediately because it will make economic sense for them to do so. Objections expressed by the industry over the switch to 0.1% when approaching HK waters have to be considered carefully.

"Safety" concerns are easily exaggerated. Fuel switching at sea is required and practiced safely around the world without causing congestion of vessels. If the stop is a serious concern, and vessels decide to sail on low sulphur outside Hong Kong waters also, so much the better.

If cost of the switch is truly a concern and vessels decide that "we'll just skip HK and go straight to Shenzhen", then the exact cost difference should be identified relative to the business opportunity of berthing in Hong Kong. If that little cost were truly the deciding factor than it is unlikely that such trade is sustainable in the long run for Hong Kong anyway. So why should the community have to pay the price with bad air?

Next our local craft (ferries, tugs, harbour craft): There must be no delay in tightening the fuel available for local craft to 0.1 or 0.05% from the current highly polluting 0.5%.

Finally, the cruise ships which operate from Hong Kong without a destination. They offer gambling and prostitution. They take tourists and stop them from spending money within our shore-based economy. In the meantime, they burn high sulphur fuel polluting Hong Kong's air shed when they are in our harbour, when they sail in and out and when they sit just outside the Hong Kong Territory. Like parasites, they pollute our air while draining our tourists from funds. Their switch to low sulphur fuel should be made mandatory immediately, or they should be slapped with punitive taxes and fees for the use of our harbour.

So far our representation

Thank you.

Adrian Lau  
Designing Hong Kong Limited