

14 Mar, 2017

Ms. Tanya Chan
Chairman of Panel on Environmental Affairs
Legislative Council Secretariat
Legislative Council Complex
1 Legislative council road
Central, Hong Kong

Dear Ms. Chan,

RE: Proposal to tighten emission standards of newly registered vehicles

With regard to the proposal to tighten emission standards of newly registered motor vehicles, Auto Italia (Hong Kong) Ltd., official importer and dealer of Maserati in Hong Kong, understands and fully supports the Government's objective of reducing roadside air pollution. In the following, we wish to present our view and comment on the proposal.

We would like to take reference from the paper on same subject, 1) CB(1)563/16-17(03) by Society of Automotive Engineers International Hong Kong, 2) CB(1)563/16-17(02) by The Motor Traders Association of Hong Kong and 3) CB(1)563/16-17(05) by The European Automotive Council of the European Chamber of Commerce in Hong Kong.

We welcome the proposal of California LEV III emission standards for diesel private cars in Hong Kong, in condition of having sufficient notice period between policy confirmation and implementation. Since 2009 the European emission standards for diesel private cars has been accepted in Hong Kong and diesel private cars with EURO 6 emission standard is recognized and accepted by Environmental Protection Department and Transport Department.

According to the initial announcement on the new emission standards implement schedule for newly registered motor vehicles in Oct 2016, only 9-month notice period is given to automotive dealers before

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actual implementation which does not allow sufficient time for the both dealers and car manufacturers to react on the proposed legislation change and adjust their product strategies.

On the other hand, vehicle planning requires a longer lead time. Proven that homologation of diesel private cars in Hong Kong is strictly supervised and takes much longer time for approval than petrol private cars by EPD. Under the tight implantation schedule, it is impossible for car dealers to replace with new models and sustain business in cost effective way, creating unexpected stress and anxiety under the economic downside.

One thing that we would like to address is that diesel private cars account for only 5% of the total diesel car population in Hong Kong. To maximize the impact on improving air quality, we suggest the panel to focus on regulating the diesel commercial vehicles which complies lower emission standards than diesel private cars and are the main source of air pollutants, including NOx emissions, in Hong Kong.

In short, we would like to support a postponement of the planned implementation California LEV III for diesel private cars to 1 Jan 2018 suggested by The Motor Traders Association of Hong Kong, allowing local car dealers to clear current stocks and providing a longer lead time for the manufacturers to transit to new diesel or non-diesel models which helps to reduce the economic impact on the manufacturers and local car dealers.

Yours sincerely

For and on behalf of

Auto Italia (Hong Kong) Ltd.

Tony Lam

Executive Director

AUTO ITALIA (HONG KONG) Ltd.

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