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21 Feb, 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: Support the Proposal to tighten emission standard of newly registered vehicles by EPD

Inchcape is a leading automotive distributor in Hong Kong for renowned global motor vehicle brands including Toyota, Lexus, Hino, Jaguar, Land Rover, Ford, Maxus and Sunwin by having 31% overall market share. Over the decades, Inchcape has given full support in bringing cleaner and more environmental friendly car models to local market for improving the air quality.

We fully support Environmental Protection Department (EPD) of the proposal to tighten the statutory emission standards for newly registered motor vehicles to Euro VI in phases, and for newly registered diesel private cars to California LEV III, starting from 1 July 2017.

Although some diesel private car vendors argued that EPD's proposed legislation changes for diesel private cars was given in short notice that time was insufficient for the manufacturers to react. In fact, EPD has officially announced the implementation schedule for newly registered diesel private cars to California LEV III in October 2016, which is almost 9 months prior to the actual implementation date. Therefore, in our opinion this is an appropriate timeline providing sufficient time for the manufacturers to react on the proposed legislation changes.

We understand that diesel vehicles emit more NOx when compared with gasoline engine vehicles and the situation will be worse in real driving situations. Importantly, researches from European Parliament and International Council on Clean Transportation (ICCT) had respectively shown that * the current real world NOx emission from diesel passenger cars are 500% higher in average than laboratory testing figures and such figures are even double the emission level of heavy duty diesel trucks and buses.


Since Hong Kong's roadside air quality has been suffering from high NOx levels, which has great impact on the public health and adversely affect life quality of Hong Kong citizens. The most stringent California LEV III should be adopted for newly registered diesel private cars as scheduled on 1 July 2017 to accelerate the process to improve NOx emission levels from diesel cars. To better protect public health, we should no longer delay the implementation of California

LEV III even the Real Driving Emission (RDE) of Euro 6c regulation standards which have been scheduled to commence in September 2019.

In view of the above, we highly concern the public health of Hong Kong and believe that the proposal to tighten the statutory emission standards for newly registered motor vehicles can bring a significant and sustainable improvement of the air quality.

Thank you very much for your kind attention and we will be happy to meet with you and further discuss on this matter. In the meantime, if you have any queries, please feel free to contact me at (852) [REDACTED] on any other details.

Yours sincerely
For and on behalf of
Inchcape HK



Patrick S. Lee
CEO, Inchcape Greater China

References:

- * i) Baptiste Chatain (2016), Parliament decides not to veto car emissions test update, The European Parliament (<http://www.europarl.europa.eu/news/en/news-room/20160129IPR11905/parliament-decides-not-to-veto-car-emissions-test-update>)
- ii) James McLaughlin (2017), ICCT: real-world NOx from Euro 6 diesel passenger cars more than 2x Euro VI diesel trucks, Green Car Congress (<http://www.greencarcongress.com/about3.html#contact>)

CC. Mr. WONG Kam-sing, GBS, JP, Secretary for the Environment and Mr MOK Wai-chuen, JP, Assistant Director (Air Policy) of Environmental Protection Department