



---

THE CHARTERED INSTITUTION OF  
WATER AND ENVIRONMENTAL MANAGEMENT  
HONG KONG

Our Ref: L00128032008

Response to the Consultation Paper on  
“A Proposal to Ban Idling Vehicles with Running Engines”

## 1. Background

Air pollution has been a key local environmental issue. Automobile exhaust is one of the major air pollutant emission sources in Hong Kong. It is the intention of the Government to stop roadside idling engines by legislative control. The Chartered Institution of Water and Environmental Management Hong Kong (CIWEM HK) appreciates and supports the proposed legislative framework to stop roadside idling engines. CIWEM HK would express our views on the proposed ban of idling vehicles with running engines, to achieve better air quality at roadside.

## 2. CIWEM HK's Views

The Consultation Paper lists out the legislative framework and a number of questions for public discussion. CIWEM HK would express our views on the questions raised in the Consultation Paper and our overall comments on the proposed legislation in the following paragraphs.

### 2.1 Coverage of the Statutory Ban

CIWEM HK considers the legislation should be put effective as soon as possible in order to improve the roadside air quality. **All types of vehicle, both private and commercial vehicles, including village vehicles, no matter the vehicles are powered by diesel, petrol or LPG should be covered.** As the legislation only requires switching off the engine when stopping, it is easy to implement without additional resource, **we consider no grace period is required.**

## 2.2 Comments on the Proposed Legislative Framework

CIWEM HK supports exemptions to be given as listed in paragraph 6.2 of the Consultation Paper, we consider the proposed exemptions could provide sufficient operational considerations and practical flexibility to the trade of transportation, emergency situations and special events. We appreciate that no exemption should be given to specific locations or hours during the day. However, we consider Hong Kong is quite hot and humid in Summer season, suspension of air conditioning during idling is inconvenient and un-comfortable to the public. CIWEM HK proposes **the ban should be waived between June and September inclusive.**

## 2.3 Enforcement and Penalty

CIWEM HK supports a fixed penalty of \$320 for non-compliance of the ban. However, **the penalty amount should be increased to deter repeated offences.** Notwithstanding the above, given the possible resistance from the trade, it is advisable to supplement legislation enforcement with education and publicity programme at hot spots, such as prominent taxi and PLB stands at the locality, with a view to facilitating compliance.

The proposed legislation not only helps improving the roadside quality, it also enhances the environmental awareness of the general public. CIWEM HK suggests that the proposed legislation should be put into force at the soonest possible.

CIWEM is the leading professional body for the people who plan, protect and care for the environment and its resources. We provide educational opportunities, independent information to the public and advice to government. Members in 96 countries include scientists, engineers, ecologists and students. For more information about CIWEM, please visit our website [www.ciwem.org](http://www.ciwem.org).

28 March 2008