

By post and by fax at 2840 0716

14 February 2014

Clerk to Subcommittee
Legislative Council Secretariat
Legislative Council Complex
1 Legislative Council Road
Central Hong Kong

[Attn: Miss Sandy SZETO]

Dear Miss SZETO

**Legislative Council Subcommittee on Air Pollution Control (Marine Light Diesel)
Regulation – Meeting on 18 February 2014**

Thank you for inviting the Institution to put forth our views on the captioned subject.

In response to your invitation, we are pleased to provide herewith our views and suggestions on the subject for your consideration.

Thank you for your attention.

Yours sincerely



Ir Raymond CHAN Kin Sek
President
The Hong Kong Institution of Engineers

Enc

RC/WC

Enclosure

**Legislative Council
Subcommittee on Air Pollution Control (Marine Light Diesel) Regulation**

**Views from the Hong Kong Institution of Engineers
on Air Pollution Control (Marine Light Diesel) Regulation**

The Hong Kong Institution of Engineers (HKIE) supports the Administration's formulation of the Air Pollution Control (Marine Light Diesel) Regulation (the Regulation) aiming at introducing regulatory control on the quality of marine light diesel (MLD) by imposing a cap on its sulphur content in order to reduce emissions from marine vessels. The HKIE considers it beneficial to the local environment in the long run and would like to provide the following views and suggestions regarding the Regulation for consideration.

2. It is understood from the Legislative Council (LegCo) Brief¹ that a proposed 90% reduction in sulphur content of MLD could only end up in a 19% reduction of sulphur dioxide (SO₂) emission from the entire marine sector. We reckon that the Administration could continue to take other steps to reduce vessel emissions by studying the feasibility of providing on-shore electricity power supply at piers and jetties for powering the basic operations of vessels while berthing in Hong Kong Water.
3. Meanwhile, the Administration may consider as to whether it is appropriate to set a grace period for the practitioners after the Regulation comes into operation on 1 April 2014.
4. Regarding the LegCo Brief, in order to provide a complete picture on air pollutants emissions from marine vessels, we opine that the impact on nitrogen oxide (NO_x) emission due to the change in the quality of MLD should be also covered.
5. According to the existing Dutiable Commodities Regulations (DCRs), lower quality vehicle diesel may be brought into Hong Kong in the fuel tanks of cross-boundary goods vehicles. This is permitted under the current DCRs as long as the fuel is used by the same vehicles and does not exceed the prescribed limits. The Administration may consider applying similar measure on marine vessels and amending relevant DCRs to limit the brought-in of high sulphur content marine diesel across the boundary.
6. However, it is concerned that with the imposition of more stringent requirements on diesel oil in Hong Kong, it might lead to increase in price, and more vessels might try to fill up diesel of lower quality elsewhere before arriving Hong Kong, which might in turn adversely affect the air quality in Hong Kong. Hence, the government is suggested to closely monitor the situation and the impact, and to tighten the prescribed limits under DCRs as necessary.

¹ Legislative Council Brief on Air Pollution Control Ordinance (Cap.311), Air Pollution Control (Marine Light Diesel) Regulation (File Ref: Annex 4 to EP 150/NV/24)
http://www.legco.gov.hk/yr13-14/english/subleg/brief/2_brf.pdf (retrieved on 10 Feb 2014)