THE REVIEW OF THE AIR QUALITY OBJECTIVES (AQOS) STAKEHOLDERS' ENGAGEMENT MEETING – CONSUMER PRODUCTS

Digest of Meetings

held on

- 1. 16 August 2017 at 10:00a.m. in Room 4637, 46/F., Revenue Tower, 5 Gloucester Road, Wanchai; and
 - 2. 29 August 2017 at 10:00a.m. in Conference Room, 33/F., Revenue Tower, 5 Gloucester Road, Wanchai

Present:

Environmental Protection Department (EPD)

Mr. Brian LAU (Chairman) Principal Environmental Protection Officer (Air

Policy)

Ms. Josephine HO Senior Environmental Protection Officer (Air

Policy) 1

Ms. Connie LUK Environmental Protection Officer (Air Policy) 23

Mr. Simon LAM Environmental Protection Officer (Air Policy) 11

Stakeholder representatives

For meeting held on 16 August
Two attendees* from a local consumer product

2017 supplier

For meeting held on 29 August Two attendees from a local consumer product

2017 supplier

AECOM Asia Co. Ltd (AECOM)

Mr. Freeman CHEUNG[#] Consultant's representative

Mr. KONG Ping[^] Consultant's representative

^{*} One attendee participated the meeting via teleconference.

[#] Attended the meeting on 16 August 2017.

[^] Attended the meeting on 29 August 2017.

Agenda Item 1 – Background of the AQOs Review

EPD welcomed the stakeholder representatives to the engagement meeting, and briefed them on the background of the AQOs Review and the purpose of the meeting to seek their views on the possibility to impose limits of Volatile Organic Compounds (VOC) on consumer products that are currently not regulated under the Air Pollution Control (Volatile Organic Compounds) Regulation (hereafter referred to as "non-regulated consumer products").

2. **AECOM** gave presentation on the prevailing control on consumer products in Hong Kong as well as in the California Air Resources Board (CARB) which was considered more stringent than other jurisdictions. Some non-regulated consumer products that were commonly used in Hong Kong were also proposed for discussion on the practicability of imposing limits on their VOC content.

Agenda Item 2 – Discussion on the practicability of imposing VOC limits on consumer products not regulated under the Air Pollution Control (Volatile Organic Compounds) Regulation

- 3. The two stakeholder representatives raised comments on the supply of non-regulated consumer products that can comply with CARB standards, means of achieving compliance and the associated implications, major concerns in expanding the control to other non-regulated consumer products, as well as the practicability of implementing the proposed control in 2025.
- 4. Detailed comments raised in the two meetings are summarized in **Annexes A** and **B**.
- 5. **EPD** would further study the categories of non-regulated consumer products and consider the potential reduction in VOC emission. Before bringing forward any proposed control measures, EPD would consult the relevant trades on their views.

Agenda Item 3 - Any other business

6. No other business was raised. The two meetings held on 16 August 2017 and 29 August 2017 were adjourned at 11:30 a.m. and 11:10 a.m. respectively.

Possible new air quality	Comments from stakeholder
improvement measure	
D : 1 C :1:1:	 Many of the non-regulated consumer products currently supplied to Hong Kong by the suppliers, such as toilet/urinal care products, bathroom cleaners and floor cleaners, were generally in compliance with the CARB VOC standards. For other non-regulated consumer products supplied to the Asian market, the supplier representative did not expect major difficulties to comply with the CARB VOC standards but would have to double check the compliance status. For those non-regulated consumer products that could not comply with the CARB standards, more in-depth assessments would be needed to determine the means of achieving compliance, e.g. change in formulation and the implications for the product costs at shelves. It would be possible that some manufacturers could not reformulate their products, e.g. hair mousse, nail polish remover and other washes to comply with the CARB VOC standards. The supplier representatives advised that they might consider stop importing these products that had limited sales volumes in Hong Kong. Consumer testing would be required to ensure no adverse impacts to the consumers' experience of using the reformulated products. The categories of consumer products to be regulated should be clearly defined to avoid misunderstanding on the scope of the control. 2025 was considered a reasonable timeframe for the implementation of the proposed control as it allows sufficient time for the necessary research, development and implementation of the proposed VOC standards.

Stakeholder's Comments (meeting on 29 August 2017)

Possible new air quality	Comments from stakeholder
improvement measure	
Review the feasibility to impose volatile organic compounds limits on consumer products that are not regulated under the Air Pollution Control (Volatile Organic Compounds) Regulation	 Apart from adopting CARB's VOC standards for consumer products, the supplier representative suggested that EPD should also consider VOC standards in other jurisdictions, such as the European Union and the mainland China. Consumer products supplied to Hong Kong by the supplier were manufactured in different countries and mainly designed for complying with European standards or places where the products were distributed. In view of the relatively small sales volume, it would be very unlikely for manufacturers to reformulate their products for complying with VOC limits just for Hong Kong. Even if reformulation would be possible, it would take considerable time for the research and development. Alternatively, the supplier could import consumer products from other manufacturers that could comply with the required standards. However, because of limited manufacturers that could supply such products, the retail price of consumer products would be increased. It could also be possibly that the supplier might consider foregoing Hong Kong market given the small sales volumes. Reducing the VOC content of some non-regulated consumer products may also affect their performance. The categories of the consumer products to be regulated should be clearly defined to avoid misunderstanding on the scope of the control. The supplier representative suggested that EPD should consult more stakeholders and allow sufficient time for the manufacturer to adapt the VOC contents. Nevertheless, the proposed timeframe for the implementation of the proposed control in 2025 was considered reasonable. They also suggested that the

Possible new air quality improvement measure	Comments from stakeholder
	Government should explore effective ways of
	controlling products imported by parallel importers.