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香港專線小巴持牌人協會  
HONG KONG SCHEDULED (GMB) LICENSEE ASSOCIATION

敬啟者：

中區電子道路收費先導計劃公眾諮詢

近年中環及鄰近地區交通擠塞情況越趨嚴重，平均車速已逐年下降，不穩定的路面交通情況已令行經的巴士、小巴班次服務受到影響；這不單影響了公共交通服務的穩定性，亦降低其營運效率。因此，本會基本上對紓緩交通擠塞方案都抱正面的態度。

就是次政府提出希望以電子道路收費來減輕中區交通負擔一事，本會認同方案能有助減少司機行經該區的意慾，並間接鼓勵市民乘搭公共交通工具，減少對私家車的依賴，是一個有效改善擠塞狀況的良方。至於在釐訂收費對象時，本會則認為以市民大眾為服務對象的巴士、小巴等公共交通服務營辦商應獲豁免。

現時專線小巴的行車路線、班次，均為運輸署所訂，是否行經收費範圍亦非營辦商可隨意作主，如向專線小巴收取費用，會額外增加其營運成本，間接增加了加價的壓力，最終令市民大眾受損，亦會減低鼓勵市民乘搭交通工具的成效，出現本末倒置的情況。因此，本會希望政府在考慮徵收費用對象時，豁免小巴業界繳費。

此致

運輸署  
運輸策劃部

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香港專線小巴持牌人協會  
馬亞木會長 黃文傑主席  
(陳文俊代行)

2016年1月8日

**AMS 進智公交**Central Maxicab Limited  
中環專線小巴有限公司

敬啟者：

有關：中區電子道路收費先導計劃公眾諮詢

就政府建議透過電子道路收費先導計劃，紓緩中區於繁忙時間交通嚴重擠塞一事，本公司是支持的，並認為有關計劃不但能減少市民駕駛至該區，亦能鼓勵市民使用公共交通工具代步。惟政府在制定收費對象時，應豁免巴士、小巴等種類的車輛。

現時本公司營運的兩條專線小巴路線均會行經中區，路線分別是 54 號(中環至瑪麗醫院(循環線))及 55 號(中環鐵路站(干諾道中)至瑪麗醫院)。路線的設立是要服務來往中環及瑪麗醫院沿途的市民大眾，而其行車路線是運輸署所釐訂的，本公司並不能隨意改動，其班次亦然。因此，本公司認為政府應豁免小巴的繳費，以免增營運路線的負擔，間接增加其加價壓力。而且，中區的交通擠塞，很大程度上是因為過多私家車所造成，因此，只收取私家車費用便能對路面情況紓緩不少。

此致

運輸署  
運輸策劃部

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中環專線小巴有限公司  
(陳文俊代行)

2016 年 1 月 8 日



香港復康聯盟  
Rehabilitation Alliance Hong Kong

均等機會 ■ 全面參與  
Full Participation and Equal Opportunity

傳真: 2802 2673

香港灣仔告士打道 7 號  
入境事務大樓 39 樓 3926 室  
運輸署  
執事先生／小姐

傳真及郵寄

敬啟者：

香港復康聯盟

對《中環及其鄰近地區電子道路收費先導計劃公眾參與文件》的意見

香港復康聯盟(下稱康盟)關注中環及其鄰近地區電子道路收費先導計劃對殘疾人士的影響，故特函 貴署表達對是次公眾參與文件的意見。

康盟原則上同意於中環及其鄰近地區進行電子道路收費先導計劃，以舒緩商業中心區的交通擠塞及空氣污染狀況，但計劃必須顧及殘疾人士的特性及需要。

殘疾人士使用公共交通工具受到一定限制，如每輛低地台巴士只有 1 個輪椅停泊區、每列港鐵列車只容許 1 位輪椅使用者上車等；公共交通工具並非點對點，加上行人路的無障礙狀況難以預測。故部分殘疾人士會選擇自駕、由他人接載或使用點對點的交通工具，如的士、復康巴士。



《殘疾人權利公約》第十九條獨立生活和融入社區提及「殘疾人獲得各種居家、住所和其他社區支助服務，包括必要的個人援助，以便在社區生活和融入社區，避免同社區隔絕或隔離」及第二十條個人行動能力亦提及「締約國應當採取有效措施，確保殘疾人盡可能獨立地享有個人行動能力，包括：(一)便利殘疾人按自己選擇的方式和時間，以低廉費用享有個人行動能力；」故對於殘疾人士自駕或接載殘疾人士的車輛，康盟均認為需要獲得豁免，以免殘疾人士因道路收費加重經濟負擔而避免進入商業中心區，影響殘疾人士的社交生活及減少選擇。

最後，康盟認為倫敦交通擠塞收費計劃亦豁免屬「殘障人士」稅別的車輛，故希望接納本會的意見，豁免殘疾人士自駕或接載殘疾人士的車輛，以免殘疾人士被邊緣化。

康盟是由不同類別殘疾人士組成的非牟利機構，一直關注與殘疾人士有關的政策及復康議題，希望可以透過團結不同類別的殘疾人士，爭取平等機會及全面參與。

如有任何查詢，請致電  
國霖先生聯絡。

與本人或康盟高級計劃幹事劉

此致  
執事先生／小姐

香港復康聯盟

總幹事莫遠君

啟

2016年3月14日

Wan Ho Kin

Name: Wan Ho Kin

就運輸及房屋局就「中環及其鄰近地區  
電子道路收費先導計劃」本人提供下列意見

Q1. 收費區包括皇后大道中, 禧利街, 德輔道中, 干諾道中, 遮打道, 車路向東西行, 因為是中區的核心, 太多「老細」車佔用路面做成擠塞。

Q2 不應該希望開始時比車交簡單及容易實行

Q3 以區域為本容易實行, 避免入圍界後停留不走及收費太高

Q4 同意

Q5 同意. 在辦公日子由早上 8:15 到晚上 7:30 已足夠。

1/2

Q6 劃一收費以便執行

Q7. 每次收費最公平

Q8 對的士可實行優惠以便有需要的人使用，因中環多醫務所及醫雲集，對病人有好處。

Q9. 自動車牌識別科技比較好，不需要全港六十萬車輛登記後才能用

Q10 沒有足夠科學知識回答這問題

Q11. "用家的反應及"道路行車快慢了，公平 (iii)

Q12. ~~同意~~地使用道路，"對附近地區有否做成塞車，

Q12 同意

Q13 ~~在~~加建停車場以便駕車者泊好車，修車在公共衣角工且

運輸局局長張炳良先生：

您好，

本人贊成政府推出電子道路收費，可是反對有豁免，因為：

1. 這樣豁免不公平。如果住在中環的駕駛者得到豁免，那麼在該區工作的是否都應該得到豁免？去該區酒店住的人能否得到豁免？如果不可以，市民便質疑政府偏袒富有的人；
2. 若政府豁免住在中環的私家車駕駛者的話，輕型貨車駕駛者便說政府對他們不公，並且要求得到同樣特權。其他車輛例如小巴、旅遊巴、5.5噸貨車、拖車、貨櫃車全部都出來向政府申訴，個個都說自己住在中環，理應得到同等待遇。這樣政府的電子道路收費系統便變得非常複雜！他們會說自己的汽車是沒有替代品，但私家車可由公共交通工具取代；
3. 住在紅磡駕車過紅隧都沒有豁免，沒有理由住在電子道路收費區的人得到豁免。如果不想付費，市民可選擇不收費的時段駕車；
4. 豁免違反本來設立電子道路收費的原意。電子道路收費本意是想減少車輛進入最擠塞的地區，但豁免某些駕駛者的話，變相鼓勵人駕駛汽車；
5. 住在中環區的人，非常則貴，駕駛汽車是奢侈品，不是必需品，不需要享有特權；
6. 中環區的交通極之方便，不同類型的公共交通工具包括的士都有，根本不需要自己駕車。如果堅持駕駛，付多一點成本又有什麼問題？
7. 政府在基建方面做了那麼多工作，投入了那麼多金錢，向駕駛者收回一點費用有何不可？政府的收費合理。

謝謝



BY: \_\_\_\_\_

## 關於「中環及其鄰近地區電子道路收費先導計劃」的建議

政府建議在中環及其鄰近地區推行電子道路收費先導計劃，本人極力反對是次收費計劃。

是次計劃的目的是理順中環及其鄰近地區在交通擠塞時段的汽車流量。誠然，外國確實有實施電子道路收費的成功例子，但並不代表香港也適合推行這項措施。以新加坡為例，並不是單靠電子道路收費系統管理車流，而是採取嚴格的車輛配額制度，這一點香港未必做得到。港府希望單靠收費計劃來解決問題，非但無助減少車輛，反為使用者帶來困擾。

計劃主要針對私家車及貨車而推行，然而出入中環及其鄰近地區的私家車多為收入水平相對較高的人士，他們因實施收費計劃而改乘公共交通工具的機會不太。至於貨車，近年本港旅遊業下滑，已對中環一帶的商舖造成嚴重打擊，再增加收費只會令他們雪上加霜。

我認為造成交通擠塞的最主要原因是區內嚴重缺乏停車場及臨時停車位。短暫停留的車輛被逼停泊於道路上，例如貨車，停泊在路邊甚至路中央上落貨，嚴重影響其他道路使用者；又例如管接送的行政車輛，因找不到停車場而被逼在道路上「兜圈」找尋泊車位，或在狹窄的道路上短暫停留，令擠塞問題更加嚴重。

政府應鼓勵將落成的大廈增設更多停車場及臨時停車位，供私家車上落客及貨車上落貨之用。有了足夠的停車場，車輛落客後可隨即泊入停車場內，以免佔據路面阻塞交通，從而減少路面因找不到停車場而徘徊行駛的車輛，大大理順該區的汽車流量。

希望政府能慎重考慮此項計劃的成效，推出真正能解決道路擠塞問題的方案。

元朗區區議員(八鄉北)

YLDC Received on

29 JAN 2016

鄧鎔耀

2016年1月26日



**Electronic Road Pricing (ERP)**

For the ERP to work effectively, Taxis have to be exempted from ERP. If Taxis are exempted, people will leave their private cars at their homes and ride Taxis. This in return will ease traffic congestion.



P00004



**The British  
Chamber of Commerce  
in Hong Kong**



4<sup>th</sup> March 2016

Professor Anthony Cheung Bing-leung, GBS, JP  
Secretary for Transport and Housing  
Transport and Housing Bureau  
22/F East Wing, Central Government Offices  
2 Tim Mei Avenue, Tamar  
Hong Kong

*Andrew Scaton*

**Consultation on Electronic Road Pricing Pilot Scheme**

I enclose the British Chamber of Commerce in Hong Kong's response to the SAR Government's consultation, issued in December 2015, on a proposed Electronic Road Pricing Pilot Scheme in Hong Kong.

*Yours sincerely*

Andrew Scaton  
Executive Director

Cc: Andrew Weir – Chairman, British Chamber of Commerce in Hong Kong

*Where business gets done*

## Electronic Road Pricing Pilot Scheme

### *Public Engagement Document – THB December 2015: British Chamber of Commerce Response*

#### **Overview**

We refer to the Electronic Road Pricing Pilot Scheme Public Engagement Document issued by the Hong Kong SAR Government in December 2015. This letter forms the consolidated response from the British Chamber of Commerce in Hong Kong (The Chamber).

The Chamber recognises that the current and growing level of traffic congestion in the central and built up areas of Hong Kong has notable effects on business operations, road side air pollution and the health and amenity of Hong Kong residents. Reflecting this, the Chamber expresses its overall support for the implementation of the Electronic Road Pricing Pilot Scheme, but believes that the Government should recognise that this measure individually would not be sufficient to tackle the problem, and should be one element of an overarching strategy. This should include a more holistic approach to transport planning (including for example the rationalisation of bus routes), a more comprehensive review of traffic flows across the harbour and on the Kowloon peninsula, including the issue of balancing tunnel tolls, and far more vigorous law enforcement of parking and traffic rules, particularly where infringement of these rules contributes to congestion.

In addition, no specific time frame for when such a scheme could be introduced into Hong Kong is noted in the consultation documents. The Chamber urges the Government to expedite the release of more comprehensive information on the specifics of the scheme following consultation and its implementation programme. The Chamber would urge that the Government should set a target date for the Central District ERP Pilot Scheme to be implemented before the end of the next Chief Executive's term, that is, before early 2022.

Responses to the thirteen specific questions raised in the public engagement document are provided below based on a balance between environmental and business issues and focus.

#### **Responses to Specific Questions**

***Question 1 - Do you have any views on how the boundary of the Central District ERP Pilot Scheme should be drawn up, and what are your reasons?***

It is considered that the precise area of the initial pilot scheme in the Central District should be carefully defined, as the engagement document points out. This should be determined by detailed feasibility studies of traffic flows, driver behaviour and the availability of space for the installation of the charging technology at the roadside.

***Question 2 - Do you think some neighbouring areas of Central, say some parts of Admiralty or Sheung Wan, should be covered in the Central District ERP Pilot Scheme? If so, which areas?***

The Chamber suggests including feeder roads outside Central District into the scheme, as well as consideration of roads surrounding the Central cross-harbour tunnel (see also our response to Question 13 below), but consideration should be given to a different charge payable for these peripheral roads. This approach would be consistent with the Singapore and Gothenburg schemes and it is considered that an extension of the scheme area in this way would be facilitated by the use of a cordon-based approach.

**Question 3 - Do you prefer an area-based or cordon-based charging mechanism for the Central District ERP Pilot Scheme? Why?**

The Chamber would favour the introduction of a cordon-based mechanism (as per that in the Singapore and Gothenburg schemes) as we consider that this better allows for long-term flexibility, both in charging rate design and in extension to other geographic areas in future as required.

**Question 4 - Do you agree that ERP charges for the Central District ERP Pilot Scheme should be imposed throughout the hours in a day when the traffic flow is high in the charging area?**

This is the underlying principle of an ERP scheme and the Chamber agrees that it should be applied in Hong Kong. It is considered that a cordon-based approach would allow more flexibility in varying these charges across the day and the geographic area chosen for the pilot scheme, to allow better fine-tuning in the reduction of traffic congestion.

**Question 5 - Do you agree that Sundays and public holidays should be excluded from the ERP charges for the Central District ERP Pilot Scheme? Do you have any other views on the charging period?**

The ERP charging structure should be designed to reduce traffic at peak times, so the Chamber agrees that Sundays and Public Holidays should be excluded or that charges are set at a much lower level for the Pilot Scheme.

**Question 6 - Which charging approach do you prefer for the Central District ERP Pilot Scheme - a unified charge for all vehicles, differential charges based on vehicle sizes (i.e. larger vehicles to be charged more), or differential charges based on vehicle carrying capacity (i.e. vehicles with higher carrying capacity to be charged at lower levels)?**

In order to achieve simplicity and better effectiveness, the Chamber would suggest that differential charges should be paid for vehicle types, based on the size of vehicle, with exemption for public transport vehicles (see Question 8 below). Charges should be lower for motor bikes and cars and higher for vans and trucks.

**Question 7 - Do you have any suggestion on the range of ERP charges which you believe could induce motorists to adjust their travel behaviour when (a) ERP charge is levied on a per day basis; or (b) ERP charge is levied on a per pass basis (charging at each and every charging point)?**

This would need to be subject to more detailed feasibility studies once the charging area and mechanism are defined. Experience in all three overseas ERP schemes studied suggests a comparable reduction in vehicle numbers of approximately 15% in the first year after introduction. The Chamber would advocate a cordon-based approach (as in Singapore and Gothenburg) to allow a flexible rate structure of different charges (for types of vehicle, time of day and exact charging point location) to be developed and designed with the aim of achieving at least a similar level of reduction in the Hong Kong context.

**Question 8 - Do you support providing exemption/concession to vehicles other than emergency vehicles for the Central District ERP Pilot Scheme? If so, what are the type(s) of vehicles and why do you choose them?**

Apart from emergency vehicles, the Chamber advocates that taxis, franchised buses and public light buses should be exempted, as the exponential growth in private cars has been the prime contributor to traffic congestion and a key initiative should be to lure people onto public transport. Disabled vehicles may also be exempted, as in London.

**Question 9 - DSRC technology requires the installation of an IVU in each vehicle entering the charging area for ERP payment, while ANPR technology captures the license number plate of a vehicle every time when it enters/leaves/circulates in the charging area. On the whole, would you say that ANPR or DSRC is a more preferable technology for the Central District ERP Pilot Scheme?**

Overall, the Chamber considers that the DSRC technology provides a more favourable technology, given that it has the capability to allow more flexible ERP charging rates and mechanisms and can ease potential privacy concerns for the community.

**Question 10 - Do you have any concern over the protection of privacy in the Central District ERP Pilot Scheme? What are your concern(s) and how do you think it/they could be addressed?**

In the engagement document, Government acknowledges that this has been a concern in past studies. Although technology has improved, The Chamber acknowledges that this may still be of concern to the public. A DSRC technology choice would mean that routinely photographing number plates is not needed (except for enforcement action) and payment for ERP fees could still be made anonymously, if the users chose to do so. The Government should also consider data security and ensure that the IT systems underpinning the Pilot Scheme should be robust and highly secure.

**Question 11 - What indicators do you think we should use to evaluate the effectiveness of Central District ERP Pilot Scheme?**

A range of measures could be considered, including the number and type of vehicles at each control point, at different times, the average travelling time, plus research into the uptake of alternative means of travel, as with the ridership of buses in the Gothenburg scheme.

**Question 12 - Do you agree that the charging level shall be reviewed regularly and adjusted where necessary in order to maintain the effectiveness of the Central District ERP Pilot Scheme?**

The Chamber suggests that charging levels should be reviewed at least annually to ensure the scheme remains effective. This would be in line with international best practice.

**Question 13 - Do you have any suggestions on measures which could probably complement the implementation of the Central District ERP Pilot Scheme?**

The Chamber would make a number of additional proposals:

- a) The very high growth in the registration of private cars over the last 10 years has contributed significantly to traffic congestion and slower journey times for all vehicles, while the number of public transport vehicles on the roads appears to have remained relatively static. Experience in Gothenburg suggests that the faster bus journey times brought about by the implementation of ERP, bus patronage will increase. However, it is considered that a review of private vehicle registration fees should be undertaken to slow the 43% increase in such vehicles over the last 10 years.
- b) In order to give travellers a better and flexible choice of transportation over that of the private car, continued investment in public transport must be made by Government and a more holistic and integrated approach into transport planning provided such that travellers have a range of options to follow, with a seamless transfer from one mode of transport to another as possible. This should cover not only the Central District but also all parts of Hong Kong.
- c) The Chamber considers it important that attention be given to the extension of the scheme to key road transport feeder routes into the Central District, including those linked to the central cross-harbour tunnel, as discussed below.

- d) In parallel to the ERP pilot scheme, reform of the level and charging system for the cross-harbour tunnels should be urgently reviewed and augmented to address the artificially low toll levels afforded at the Government-owned Central cross-harbour tunnel, resulting in significant traffic congestion on both sides of the harbour almost every day. Thus, the Chamber considers that ERP could be applied to feeder roads for the tunnel (say in Wan Chai, Causeway Bay or Kowloon) and the same technology chosen for the Central District ERP Pilot Scheme applied for the tunnel tolls.
- e) The revenue raised by the ERP scheme in Hong Kong should be specifically used for the improvement of public transport, as in the London and Gothenburg schemes. The Chamber believes this could be an important additional factor in securing wide public support for the scheme.



The Chartered  
Institute of Logistics  
and Transport

RECEIVED  
14 MAR 2016

10<sup>th</sup> March 2016

BY: \_\_\_\_\_  
Professor Anthony CHEUNG, GBS, JP  
Secretary for Transport and Housing  
Transport and Housing Bureau  
22/F East Wing,  
Central Government Offices,  
2 Tim Mei Avenue,  
Tamar, Hong Kong

Dear Prof. Cheung,

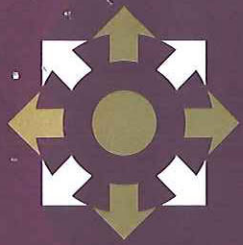
**The Central District ERP Pilot Scheme**

Thank you for inviting our Institute to the Focus Group meeting in January 2016 to express our views on the Central District ERP Pilot Scheme.

The Chartered Institute of Logistics and Transport in Hong Kong (CILTHK) has all along been in support of the launch of a pilot scheme on ERP as one of the measures to combat against traffic congestion and would urge the government to start the preparatory work as soon as practicable. Our representatives have fully elaborated our considered views at the Focus Group meeting. To facilitate your ease of reference, we submit our views in writing and hope that you would give due consideration to them in your way forward.

Yours sincerely,

Sunny Ho  
President  
The Chartered Institute of Logistics and Transport in Hong Kong



## **The Central District ERP Pilot Scheme Views of CILT**

### **Overall**

- In response to the Report on Study of Road Traffic Congestion in Hong Kong submitted by the Transport Advisory Committee (TAC) to the Secretary for Transport and Housing (STH) in December 2014, the CILTHK made a submission on 20 March 2015 and stated specifically that "the CILTHK supports the "user pays principle" in charging motorists for entering some strategic locations during traffic peak hours. The pilot scheme in Central should be implemented as early as possible to test the effectiveness of the scheme."
- We note the government considers now to be the right time to launch a pilot scheme on ERP in view of (a) the serious traffic congestion in Central and its adjacent area; (b) the maturity in ERP technology; and (c) the availability of alternative route and mode of transport due to the near commissioning of the Central-Wanchai Bypass and the new railways. The CILTHK supports in principle the government's initiatives of launching an ERP pilot scheme in Central District and its adjacent areas. We urge the government to start the preparatory work for the launching of the pilot scheme as soon as practicable.

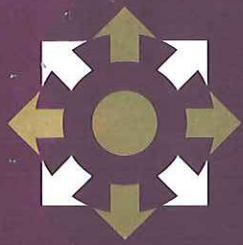
### **Basic Elements for Planning the Central District ERP Pilot Scheme Charging Area**

- We note that ERP charging area is usually set in the central business districts where road traffic congestion problem is severe. The government considers that Central and its adjacent areas are considered suitable for launching a pilot scheme based on the considerations that the road traffic conditions in these strategically important areas are far from satisfactory, with traffic speed as low as about 10 kph; the areas are well served by public transport; and the coming Central-Wanchai Bypass will provide an alternative bypass route.
- The CILTHK considers that the boundary of the Central District ERP Pilot Scheme should be set with reference to -
  - the traffic condition, i.e. traffic volume, journey speed, traffic mix, etc.
  - the availability of alternative route for passing through traffic
  - the avoidance of creating bottlenecks at adjacent areas of the charging area
  - the ease of setting up the infrastructural support

### **Charging Mechanism**

- The two commonly used charging mechanisms are the area-based mechanism and the cordon-based mechanism. An area-based charging mechanism is simple, mostly with a daily rate regardless of the distance or duration a motorist travels within the charging area. Under a cordon-based charging mechanism, a vehicle can be charged on a per pass basis at the cordon point and during the charging period. This allows ERP charging level to be varied according to the time of the day, location and travel direction, and is more in line with the "user pays" principle.





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- We are in support of a cordon-based charging mechanism for the Central District ERP Pilot Scheme as
  - it serves better to control the traffic flow in and out of the charging area and
  - is more flexible in catering for different traffic situations for different directions and times of the day.

### Charging Period

- The government considers that the charging period should cover the periods when traffic in Central and its adjacent areas is busy and congested. Traffic flow in Central and its adjacent areas is very high throughout weekdays (from 7 am to 8 pm) and Saturdays (from 8 am to 8 pm).
- The CILTHK considers that the charging period should be set with reference to the traffic flow in the area. Flexibility should be maintained to review and adjust the charging period according to changes in traffic pattern.

### Charging level

- The purpose of ERP is to induce motorists to consider adjusting their travel behaviour. A host of factors would have to be taken into account, including motorists' behaviour, traffic flow variation, charging mechanism, vehicle types to be charged or exempted (if any) and public views. The government would focus the discussion on three charging approaches: (a) a unified charge for all vehicle types, (b) differential charges based on vehicle sizes, and (c) differential charges based on a vehicle's carrying capacity. Motorists will need to pay penalties if they fail to make timely payments.
- The view of CILTHK is that the ERP charge should reflect the economic use of road space. As the purpose of ERP is to curb traffic congestion, it should be charged on a per pass basis during the charging period. The charging level may vary with due regard to the variations in the traffic situation.

### Exemption / Concession

- Emergency vehicles are exempted from ERP payment. The Singapore Scheme does not provide for exemption or concessions for any other types of vehicles. The Gothenburg Scheme granted exemptions to diplomatic registered vehicles, military vehicles, buses over 14 tonnes and motor cycles. Under the London Scheme, buses are exempted, licensed taxis and private hire vehicles are granted full concessions, while residents living within the zone can apply for concessions (90% discount) for one of their private vehicles. No exemption / concession are granted to the goods vehicles in the three overseas ERP schemes, though Singapore Government made a special arrangement to phase in the full ERP charges on goods vehicles over four years. The argument is that the introduction of ERP charges may provide the logistics industry with an incentive to conduct delivery services outside the charging period.
- Other than emergency vehicles, the CILTHK considers that buses, GMBs and carriers for disabled passengers should be granted exemptions. Fixed route public transport vehicles are regulated and controlled by the government. They are economic users of road space. They are complementary measures / alternatives to cater for people movement in response to the ERP schemes.



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The number of passes are well regulated and the operators is normally not allowed to vary the routeing or headway at free will. Taxis may warrant some special considerations and further study as though they are public transport modes, they are personalised transport which the "user pays" principle should apply.

- Consideration may be given to grant concessions to vehicles of residents in the charging area under certain conditions, such as the number of vehicles, the number of passes through the charging area, etc.

### Technology

- Currently there are two mature ERP technologies, namely "Automatic Number Plate Recognition" ("ANPR") and "Dedicated Short-range Radio Communication" ("DSRC"). ANPR uses cameras to capture the images of the licence number plates of vehicles passing through ERP areas. As for DSRC, vehicles are required to pre-install an in-vehicle unit ("IVU") for information exchange between the vehicle and the ERP equipment at the charging points.
- We support the use of DSRC as
  - It is simpler to administer.
  - It is more dynamic to cater for variations in the charging period and charging level.
  - The requirement to install an IVU may also serve as a means to deter vehicles from entering into the charging area unnecessarily.

### Other Pertinent Issues

#### Privacy Concern

- There should not be any privacy concern in particular if we adopt the DSRC.

#### Effectiveness

- The CILTHK considers that there should be periodic monitoring reports to compare the "before" and "after" situation of the implementation of the ERP scheme, and the coverage should also include the vicinity of the charging area to see if the ERP scheme would lead to any bottlenecks or diversion effects outside the charging area.
- Indicators to evaluate the effectiveness of the scheme can be
  - Traffic flow
  - Traffic speed
  - Journey time, in particular the journey time of buses as it is well understood and appreciated by the general travelling public
  - Vehicles mix
  - Environmental pollution data

In addition, impact on the retail business in the charging areas should also be studied. This may be of concern if the ERP scheme is to be pursued further.

#### Complementary measures

- Public transport services should be strengthened as necessary to provide good alternatives to passengers. Consideration may be given to use the revenues from the ERP charges to improve the public transport system, to help in



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stabilising public transport fares, to improve transport infrastructures, etc. This would also help fight against accusation that the aim of the ERP scheme is simply to increase government revenue.

- Provision of park and ride facilities and concessions at suitable locations outside the congested areas for interchange to public transport services are supported.
- Good pedestrian walkway systems should also be provided to facilitate movements inside the charging areas as well as linkage with adjacent public transport interchanges.
- Consideration may also be given to introduce pedestrianisation schemes in the charging areas with due reference to traffic situation.
- Strict traffic enforcement should be exercised within the charging areas, in particular against parking offences.



香港  
灣仔告士打道7號  
入境事務大樓  
運輸署

**反對電子道路收費計劃**  
**要求首先打擊非法泊車**

就政府近月提出『中區電子道路收費先導計劃』，本人認為政府不應實行中區電子道路收費，反而應先做好路面管理、執法打擊非法泊車，以保持區內交通車流。

現時中區交通擠塞的主因是非法泊車問題，在中區內要道如皇后大道中、遮打道等往往三條線中有兩條線均被非法泊車阻塞，而雪廠街、砵甸乍街等則兩條線有一條被非法泊車阻塞，令到原有的中區交通容量被降低一半以上。故從成效以言，當局應先做好路面管制，加強執法以釋放被阻塞的路面容量從而令交通容量立即增加一倍，而非實行花費上億的電子道路收費卻只能減低一至兩成的車流。

當局應先做好路面執法工作，改變現時司機可於中區公然違法而不需承擔任何後果的文化，而非懲罰沒有公共交通又需要進入中環的山頂區居民。當局引入花費高昂的收費系統以彌補警方執法不足的問題，實在是本末倒置。

我們希望政府能接納我們的建議，加強打擊非法泊車，釋放道路空間，改善車流，長遠解決中西區交通擠塞問題。先此致謝！

順祝 工作順遂！

此致  
運輸署

陳浩濂  
中西區區議員(山頂)  
二零一六年三月十日

香港  
灣仔告士打道7號  
入境事務大樓  
運輸署

反對電子道路收費計劃  
要求首先打擊非法泊車

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當局應先做好路面執法工作，改變現時司機可於中區公然違法而不需承擔任何後果的文化，而非懲罰其他必須要路經或前往中區工作的守法司機。如貨車等送貨車輛前往中區需要收費，將難免增加運輸業以至區內各商戶的經營成本，損害經濟。

我們希望政府能接納我們的建議，加強打擊非法泊車，釋放道路空間，改善交通車流，長遠解決中西區交通擠塞問題。先此致謝！

順祝 工作順遂！

此致  
運輸署

香港貨車運輸業協會  
江志強 主席  
二零一六年三月十日

Updat By Hand

P00008

Transport Department  
Rm 326, 3/F  
Jaminpraha Tower  
7 Gloucester Rd,  
Wanchai, HK

11<sup>th</sup> March 2016.

Via Transport Dept Box  
Cheong Sha Wan Govt Bldg  
3/F



Dear Sir (Madam)

Disabled View on Electronic Road Percip

I understand less traffic higher mobility & human rights of free access that you grant free tunnel tolls to us. I had sent my appreciation card to your box today for efficient help & service.

Please ensure no charge for Disabled for its the only tunnel you grant us free to central. My doctors, physiotherapy, teachers all near HK University & some Mo's deam. doctor in Central. Kindly not marginalize us & care for us! Before you <sup>right</sup> ~~erase~~ it of way to HKU

Love  
Cheung Chow  
11.3.2016.



P00009

HONG KONG PROFESSIONALS AND SENIOR EXECUTIVES ASSOCIATION  
香港專業及資深行政人員協會

運輸及房屋局局長  
張炳良教授, GBS, JP 鈞鑒：

「中環及其鄰近地區電子道路收費先導計劃」意見書

本會非常關注政府提出的「中環及其鄰近地區電子道路收費先導計劃」，認同香港目前具備不少適合推動該計劃的客觀條件，包括中環灣仔繞道可作免費替代路線、擴展的鐵路網絡、電子道路收費科技進步等。本會深入討論後，就該計劃的執行範圍、細節及相關配套安排等提供一些意見。期望政府儘早籌備及落實計劃，提升中環的運輸效率，建設更佳的營商與生活環境，推動香港經濟持續發展。

現謹附上有關意見書，供閣下參閱。

敬頌  
鈞祺！

香港專業及資深行政人員協會

會長 陳紹雄 敬啟

二零一六年三月十一日  
附：意見書



HONG KONG PROFESSIONALS AND SENIOR EXECUTIVES ASSOCIATION

香港專業及資深行政人員協會

# 「中環及其鄰近地區電子道路收費 先導計劃」意見書

2016 年 3 月





HONG KONG PROFESSIONALS AND SENIOR EXECUTIVES ASSOCIATION

香港專業及資深行政人員協會

2016/2017 年度

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|       |   | 楊全盛先生                | 潘燊昌先生              |
|       |   | 蔡淑蓮女士                | 龐朝輝醫生博士            |

註：依職位資歷及筆劃排序



# 香港專業及資深行政人員協會

## 經濟事務委員會

主席： 梁廣灝工程師, SBS, OBE, JP

## 環境及基建專責小組

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蘇裕年先生	

註：依本會職位及筆劃排列



**香港專業及資深行政人員協會**  
**「中環及其鄰近地區電子道路收費先導計劃」意見書**  
**2016年3月**

**前言：**

核心商業區中環經常受交通嚴重擠塞問題困擾，政府 30 年前已開始研究電子道路收費，惟因各種原因未有實行。本會非常關注政府提出的「中環及其鄰近地區電子道路收費先導計劃」，認同香港目前具備不少適合推動該計劃的客觀條件，包括中環灣仔繞道可作免費替代路線、擴展的鐵路網絡、電子道路收費科技進步等。本會深入討論後，現就上述計劃的執行範圍、細節及相關配套安排等提供一些意見，期望政府儘早籌備及落實計劃，提升中環的運輸效率，建設最佳的營商與生活環境，推動香港經濟持續發展。

**香港專業及資深行政人員協會的意見：**

**1 只在中環區推行電子道路收費先導計劃**

中環為香港重要的商業中心，該區繁忙時段交通嚴重擠塞的問題必須儘快處理，本會非常支持政府在中環推行電子道路收費先導計劃。然而，本會不建議把金鐘及上環等鄰近中環的地區納入上述計劃，以便市民可利用金鐘或上環作中途轉車站上落車，再以步行或使用其他公共交通工具前往或離開中環。本會建議政府深入研究中環區的交通現況及數據，進行專業技術分析，以劃定適當的收費區界線，讓上述計劃充份發揮管理交通的功能。

**2 採用按日收費的區域為本收費機制 並徵收逗留費用**

本會建議採用按日收費的區域為本收費機制，執行及監管上較簡便，行政成本相對低，駕駛者亦易於理解。當車輛在收費時段駛入收費區或使用區內道路，便需要繳費，駕駛人士在繳付按日徵收的費用後較願意把車輛駛離收費區，讓收費區的道路保持暢通。參考外國的經驗及



中環區停車場的入場費，本會建議按日收費水平設於約港幣 100 元，促使駕駛人士改變其在收費區的駕駛行為。

此外，為避免車輛繳付上述收費區「入場費」後長期逗留區內，引致交通阻塞，本會建議在按日收費外，亦向駕駛人士徵收逗留收費區的費用，即若車輛在繳付「入場費」後一段時間，仍持續逗留在收費區內，而非停泊在區內的合法停車場，將以累進式徵收率計算有關的逗留費用，車輛在收費區內逗留的時間越長收費越貴，目的是希望車輛儘快離開收費區，有關逗留費用建議可參考公共停車場的收費。

### 3 收費區應實施全日收費

中環區部份道路較狹窄，政府實施電子道路收費先導計劃的大原則應確保收費區道路暢通。本會建議收費區應實施全日收費，不同類型車輛亦應劃一收費，以減低行政成本。本會認為政府不應只在交通流量高的時段收費，避免收費區邊緣地區在收費時段結束前出現車龍或擠塞，影響計劃的成效。

#### 3.1 平日及星期六實施全日收費

按諮詢文件圖 4.2 的資料顯示，中環在平日及星期六的交通特別繁忙，故本會建議收費區在平日及星期六應全日收費，而交通流量明顯較低的星期日及公眾假期則不須收費，並應避免在不同時段設不同收費，以免增加計劃的執行難度，以及讓交通擠塞問題在其他時段出現。

#### 3.2 非繁忙時段的特別安排

中環不少零售商店、食肆、超級市場經常需要補充貨物，為免收費區交通因此受影響，本會建議政府深入研究該區在平日及周六非繁忙時段的交通流量，制定貨車上落貨的寬限時段，例如凌晨 2 時至 6 時等，讓貨車在該段時間可以免費出入收費區卸貨或取貨。同時，本會建議亦應制定的士等不同類型車輛在平日及周六非繁忙



時間使用收費區道路的特別安排，例如的士在非繁忙時段進入收費區上落客，若未有逗留在收費區則可獲豁免逗留費用。

#### 4 推行有限度的豁免安排

本會認同電子道路收費計劃豁免越多，成效將大打折扣，建議只有性質特殊及服務市民的車輛才能獲豁免道路收費，包括消防車、救護車、警車等緊急服務車輛；巴士、小巴等公共交通工具；接載殘疾人士的車輛等。

此外，政府制定電子道路收費先導計劃時，亦應就收費區的合法停車場，制定電子道路收費先導計劃的配合安排。本會建議停泊在收費區合法停車場的車輛，可獲豁免逗留區內所衍生的逗留費用。本會相信日後透過車內裝置連接停車場之收費裝置，技術上可即時完成豁免手續。而其他車輛種類一概不應獲得豁免或優惠，以免影響該計劃的成效。

#### 5 採用操作自動化的短距離微波通訊

電子道路收費科技日新月異，香港不少駕駛人士已在車內安裝裝置，使用海底隧道時享受便捷的自動道路繳費服務。本會建議政府在電子道路收費先導計劃採用「短距離微波通訊科技」，該項技術操作自動化，駕駛人士只要駛經電子道路收費門架，收費裝置可識別車輛種類或應否獲得豁免，透過車內裝置可即時付款或豁免費用，便捷可靠，而且政府及駕駛人士也可隨時查閱相關記錄，方便日後的評估工作。上述科技省卻「自動車牌識別科技」所需的人手核對車牌，以及處理收費之行政程序。配合自動拍攝違例車輛車牌的攝影機，政府可更有效的執行該計劃及監管違法行為。

本會建議政府應研究「短距離微波通訊科技」與現有電子收費汽車裝置融合使用的可行性，讓駕駛人士只需在車內安裝一個裝置，便可以支付電子道路收費、隧道費及泊車費，進一步減低實行該計劃所需的車內裝置安裝成本。



## 6 以交通流量及平均行車速度評估成效

香港首次引入電子道路收費，必須定期檢討，評估成效，本會建議比較推行電子道路收費先導計劃前後的交通流量及平均行車速度，了解交通流量的減幅及相應增加的平均行車速度，以持續完善是項交通管理措施，有需要時可推展至其他同樣面對嚴重交通擠塞的地區。

## 7 現代科技能保護私隱

本會認為科技進步，已有妥當方法保護駕駛人士的私隱。本會建議政府就先導計劃可能引起的私隱憂慮，與個人資料私隱專員公署加強溝通與合作，商討可行的處理安排，消除公眾對私隱的疑慮，讓該計劃得以順利推行。

## 8 配套措施

### 8.1 具備免費的替代路線

電子道路收費先導計劃要有效推行，本會認為必須具備一條免費的替代路線，而預計 2017 年建成的中環灣仔繞道可作為替代路線，讓來往中西區及東區的駕駛人士免費使用，既有助紓緩中西區交通嚴重擠塞的問題，亦可避免駕駛人士在毫無選擇下被迫付費使用中環道路，故本會促請政府必須在中環灣仔繞道通車後，才推動電子道路收費先導計劃。

### 8.2 加強執行交通法例 增加停車場提供更多泊車位

中環違例泊車的問題嚴重，經常阻塞交通，本會建議政府加強執行交通法例，並於區內增設停車場，提供更多泊車位，鼓勵車輛在繁忙時段使用泊車位上落客或上落貨，以維持該區道路暢順。

### 8.3 積極重組巴士路線

為改善中環的道路效益，本會建議政府積極與巴士營運商共同推動巴士路線重組的工作，減少重覆路線，有效運用資源，提升巴



士營運效益及運輸效率，完善地區公共交通服務網絡，紓緩交通擠塞問題，亦可改善路邊空氣質素。

#### 8.4 調整三條海底隧道收費疏導交通

為進一步疏導港島核心商業區的交通，本會建議調整三條海底隧道的收費，進一步減低紅磡海底隧道的負擔，以配合電子道路收費計劃的推行。

#### 8.5 車內裝置應配合未來智慧城市的發展

本會建議日後車輛之車內裝備應配合未來智慧城市之發展，讓駕駛人士可即時接收收費區內之交通流量及平均行車速度等顯示交通擠塞程度的資訊，配合電台的交通資訊廣播，促進交通資訊流通，讓駕駛人士預早了解收費區的即時交通狀況，助其選擇更快捷更合適的出行路線，有助管理交通。

#### 結語：

中環交通嚴重擠塞問題已持續多年，本會支持政府籌備在中環推行電子道路收費先導計劃。本會建議於繁忙的平日及星期六採用按日收費的區域為本收費機制，同時徵收逗留費用，以免車輛長期逗留區內。為便利執行及管理，政府應採用操作自動化的短距離微波通訊，並配合免費替代路線、加強執行交通法例及增加泊車位、積極推動巴士路線重組、調整三條海底隧道收費疏導交通等安排，並應加強鼓勵市民乘搭公共交通工具前往及離開收費區，多管齊下才能更有效地紓緩中環的交通問題。



致： 運輸署署長  
楊何蓓茵 女士, JP

### 中環及其鄰近地區電子道路收費先導計劃

「香港的士業議會」(下稱議會)於2015年11月5日成立，議會成立的目的是希望透過行業各持份者的合作，齊心以實際行動引入自我監管模式，務求提升的士業界的服務質素。議會是由業界及社會人士組成。現時有十七個較為活躍的的士業團體為創會會員，他們旗下所屬及管理的的士和司機數目佔市場份額超過一半。

為改善交通擠塞的問題，運輸及房屋局局長考慮交通諮詢委員會(交諮會)於2014年12月提交有關解決道路交通擠塞的研究建議，其中一個建議是籌劃在中區推行電子道路收費先導計劃。對於政府進行「中區推行電子道路收費先導計劃」的研究，香港的士業議會有以下意見：

就「推行電子道路收費計劃」這個議題早於1984年已提出，並先後進行了三次研究，惟事隔多年，有關計劃並沒有寸進。對於「電子道路收費」計劃，議會認同計劃在某程度上是可以減少車輛數目進入繁忙地區，是有效地提升路面空間使用效益的一個方案。由於計劃是具針對性，主要在交通擠塞的個別地區及時段實施，受影響的只有於繁忙時間進入繁忙地區的駕駛者，因此，計劃可避免透過增加稅收一刀切地向所有駕駛者開刀，合乎「用者自付」的原則。

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#### <sup>1</sup>香港的士業議會 創會會員

九龍的士車主聯會

車馬樂的士聯會

的士車行車主協會

香港計程車會

港九電召的士車主聯會

新興的士電召聯會

自由的士權益協進會

忠誠車行

香港的士小巴商總會

泰和車行

新星的士同業聯會

聯友的士同業聯會

西貢的士工商聯誼會

的士司機從業員總會

香港的士商會

偉發的士車主聯會

新界的士車主司機同業總會

\* 排名依筆畫順序



車輛數目持續增加，交通擠塞情況無疑是較三十多年前首次提出「推行電子道路收費計劃」時嚴重，由於中環是主要的商業貿易區，而其交通擠塞情況相對經濟影響尤其嚴重，因此，政府先以中區及其鄰近地區作為推行電子道路收費的先導計劃是十分合理。

現時中區的交通擠塞，當中原因除車輛數目持續增加外，警方對路邊違泊車輛執法不力亦是導致中環「有路行不到，得物無所用」之箇中主要原因之一。議會認為政府應即時加強道路的管理及對違泊司機加強執法，以解決中環道路擠塞的問題。道路的擠塞，不但加劇路邊空氣污染的問題，影響市民健康，還會因塞車所增加的車程時間，減低市民的生產品力，當中涉及龐大的社會成本。因此，改善交通擠塞確實是當務之急。既然「電子道路收費」計劃在新加坡和倫敦等海外城市均已推行多年，技術已步入成熟階段，議會並不反對政府推行「中環及其鄰近地區電子道路收費先導計劃」。

由於中區是港島來往東西區必經之地，為避免加劇中區外圍道路的交通負荷及迫使駕駛人士必須繳費之嫌，議會認為「電子道路收費先導計劃」必須有待中環灣仔繞道開通以提供替代道路予駕駛者選擇後才展開。至於其收費機制，議會認為應採取「周界為本機制」，並可因應不同時間及擠塞程度作出調整，而初期可以用較低收費水平以測試成效，並了解駕駛者對計劃的反應及有關系統是否完善。

為減少車輛數目進入繁忙區域，除實施「電子道路收費先導計劃」外，透過收費增加駕駛成本而減低駕車進入繁忙區域的意慾，亦應同時鼓勵市民使用公共交通工具。議會認為當局應豁免的士電子道路收費，以鼓勵的士進入收費區，讓有需要的市民得以選用的士，取代私家車。「電子道路收費計劃」是否能有效地減少車輛進入收費區，很大程度是取決於其收費水平，空置的士本身固然不會主動進入收費區，倘若收費過高，乘客會避免乘坐的士進入收費區，屆時區內的的士服務將會因此而受影響。若果的士這類個人化點對點的公共交通工具在收費區內供應不足，必會降低私家車車主放棄駕車的意慾，削弱「電子道路收費計劃」的成效。

雖然議會認同「電子道路收費計劃」在某程度上是可以減少車輛於繁忙時間進入繁忙地區，並支持政府進行「中區推行電子道路收費先導計劃」的研究，但我們認為改善道路擠塞不能只利用收費以壓抑交通需求，要透過多管齊下的措施，包括對違泊車輛加強執法、改善現時三條過海隧道分流不均的情況及完善道路網絡等。與此同時，政府應仿效倫敦的做法，利用收到的道路費，提供誘因，讓更多人乘坐的士或其他公共交通工具進入中環收費區。

就上述意見，希望 署方能予以考慮。如有問題，請致電 與本人聯絡。

香港的土業議會主席

熊永達 謹啟

2016年3月11日

副本送：

運輸及房屋局局長 張炳良教授, GBS, JP

立法會航運交通界議員 易志明, JP

No.

Date

致

香港灣仔告士打道7號  
入境事務大樓39樓3926室  
運輸署

假如「中區電子道路收費先導計劃」一定要實施的話，首先要豁免下列類別車輛收費：-

(甲)

1. 警車，消防車及緊急救護車  
包括消防處，醫院管理局之救護車及非緊急接送支援服務車及聖約翰救傷車。
2. 非牟利及慈善團體如東華三院、聖雅各福群會接送老弱/傷殘人士往其中心或戶外活動之車輛
3. 在上學日接載學童往返學校/戶外活動之校巴及保姆車。  
(符合附錄3 I.8)
4. 公共車輛如巴士，電車，專線小巴，公共小巴，地鐵
5. 傷殘人士駕駛之車輛  
(見諮詢文件 3.3.14)

6. 的士是重要交通工具之一，特別中區及鄰近地區有很多醫務所，市民及老弱傷殘人士需要倚賴的士出入看病。用者自付方式不能加在的士轉架乘客，不然便沒有空車往中環及鄰近地區，在中環及鄰近地區有空車供乘客上車。便沒

(見諮詢文件 3.3.14。該段提到「新加坡計劃及倫敦計劃」都豁免的士繳費)

7. 電單車 (見諮詢文件 3.3.25 豁免於「哥德堡計劃」下及附錄 3.15 倫敦交通計劃下豁免兩輪電單車 (及其側車) 和輕便電單車。

8. 其他政府部門車輛，特別是食物及環境衛生署，康樂文化事務署，路政署，機電工程署，渠務署，水務署等署去執行緊急任務時之車輛，如清場，爆水管，鋸樹，塞渠，交通燈失靈，路陷等所使用之垃圾車，吊臂車，掘路車，舖蜡青後之轉地車，落三合土的工程車，

拖車(如拖走違例泊車時使用)等

9. 上述「8」部門等等所僱用去執行有關公務之合約商(CONTRACTOR)要使用的車輛或工程車。

10. 中區及其鄰近地區內之銀行所使用之解款車  
(符合諮詢文件附錄3<sup>I</sup>第8項「倫敦計劃,豁免之車輛類別」收費區內地方機構所用的特定營運車輛"之例子)

11. 公共事業機構如煤氣公司, 電燈公司, 巴士公司, 電車公司, 港鐵或其僱用之合約商去執行所屬維修特別是緊急維修時所使用之車輛/工程車。

12. 中央駐港部隊之軍車

13. 外國駐港領事/商務專員之特定車輛

(乙)

即使上述車輛某些類別一定要收費或繳付“優惠費用”要有下列處理：一

- # 1. 不應有時段限制 (SECTION OF TIME)
- ▷ 2. 不應有逗留限制 (DURATION OF STAY)

(# 即是在“收費時段”內不應限制在什麼時間內才可豁免或繳附優惠費用)

(△ 因在執行任務/緊急維修時，不可能預測所需時間)

(丙)

倘若以“周界為界”作收費機制，進入收費區經過收費點便要繳費，但經過另一收費點離開時不應再收費（過海隧道、香港仔隧道等也是進入時收費，為離開後不再收費），但為杜絕取巧應考慮設定要其車輛在一段時間內便要離開該區，其後在任何收費點再進入便要再繳費。

TEL.

DATE=16/3/2016 市民 K.F. WONG



Hong Kong General Chamber of Commerce  
香港總商會1861

16 March 2016

Professor Anthony Cheung, GBS, JP  
Secretary for Transport and Housing  
Transport and Housing Bureau  
22/F, East Wing, Central Government Offices  
2 Tim Mei Avenue  
Tamar, Hong Kong

Dear

A handwritten signature in blue ink that reads 'Secretary'.

### **Electronic Road Pricing Pilot Scheme in Central and Its Adjacent Areas**

The Chamber welcomes the opportunity to comment on the Government's plan to launch an Electronic Road Pricing Pilot Scheme ("ERPPS") in Central and its vicinity for the purpose of addressing the city's notorious traffic jams and improving roadside air pollution. We agree that the Government should explore the notion of electronic road pricing ("ERP") as a tool to control traffic but also feel that attention should be devoted to other issues that contribute to the chronic problem of traffic congestion in the Central District as ERP alone is not enough as to provide relief. Chief among these is insufficient parking spaces. Drivers, particularly chauffeurs, are often left with the options of either driving in circles or to find a temporary, often illegal, parking space. As pointed out by the Government, the number of illegal parking cases has increased significantly by 44% to about 1.08 Mn cases in 2014 from 750,000 cases in 2010. If building more car parks in Central is a challenge, it may be useful for Hong Kong to consider the approach adopted in other countries to develop hi-tech, three-dimensional deck-style parking systems to enhance parking capacity. The Government should also contemplate a multi-pronged approach to addressing congestion by stepping up law enforcement and raising parking fines<sup>1</sup>.

2. There are other issues as well that contribute to congestion in Central, which also warrant the Government's attention and should be addressed in parallel with or independent of ERP implementation. These are the (1) rationalisation of routes to improve the efficient deployment of road-based public transport, namely, franchised buses; (2) regulation of hours when goods vehicles can make deliveries; and (3) mitigating knock-on effects of congestion from abutting districts. Further elaborations on the foregoing are made further in the submission.

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<sup>1</sup> It is [proposed](#) to increase the fixed penalty charges by 50%, i.e. traffic offences currently set at \$320 and \$450 will increase to \$480 and \$680 respectively, effective from 1 January 2017.

Our comments and observations on the proposed ERP are as follows:

### **Charging Model and Mechanism**

3. An area-based ERP system would appear less cumbersome and easier to implement but lacks flexibility when responding to actual road conditions and the need to make frequent adjustments over the course of a day. Hence, a cordon-based system would be more suitable for Hong Kong. If the latter is adopted, initial charging fees should be set at a level effective enough to alleviate traffic congestion problems and these charges should be subject to regular reviews to ensure the objectives are met. We feel that considerations relating to such issues as the drawing of boundaries, the coverage of peripheral areas (i.e. Admiralty, Wanchai<sup>2</sup> and Sheung Wan), the inclusion of Sundays and public holidays as charging periods, and the methodology for imposing charges (whether these should be made according to vehicle type, size or capacity) should all be based on the empirical results derived from traffic modelling rather than misinformed opinions and baseless speculations. We look forward to receiving more information and in-depth analysis from the Government in this regard at the later stages of the public consultation exercise.

### **Technology and Data Privacy**

4. As data privacy has increasingly become a major concern for the public and the business community, dedicated short-range radio communication (“DSRC”) would therefore be preferable over automatic number plate recognition (“ANPR”). ANPR, which relies mainly on capturing car plate numbers for payment settlement, requires manual checking and verification of car plates. Although DSRC requires the installation of in-vehicle units (“IVUs”) in vehicles, payment is made on an anonymous basis. It is less likely to give rise to concerns about the capture and storage of car plate images, and is therefore a less costly and intrusive system to implement.

### **Exemption and Concession**

5. We agree that adopting a user-pays principle is balanced and fair. All vehicles contributing to congestion, except emergency vehicles, should pay. Such practice would also be in line with those in other countries. The more vehicles are exempted, the less effective the system would have in reducing traffic jams. We believe that public transport such as minibuses, franchised buses and trams will not be overly affected by the additional charges as these can be easily absorbed or passed on to passengers who may be required to assume a negligible increase in fares. Nonetheless, bus operators should be encouraged to consolidate overlapping routes and streamline closely-spaced bus stops to enhance service efficiency and reduce the number of vehicles on roads. Meanwhile, taxis and trucks would most likely be affected, which may bring about an appreciable change in travel behaviour and patterns. To minimize the impacts on people living within the district, the Government could consider some concessionary measures for residents. It may also do the same for goods vehicle operators to encourage them to load and/or off-load goods during off-peak hours. The effectiveness of such concessionary measures should be closely monitored and

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<sup>2</sup> Traffic congestion in Wanchai North can have a spill-over effect on road conditions in Central, which is often attributable to major events at the Hong Kong Convention and Exhibition Centre and involves the loading and/or off-loading of fitting-out materials by trucks pre and post events.



assessed after the implementation of the ERPPS. Adjustments to the ERP could be considered at a later stage on the adoption of such measures as confining loading and/or off-loading activities to specific times of the day, which are similar to practices in some western cities where congestion is a problem.

### **Central-Wanchai Bypass and Ancillary Developments**

6. We agree with the Government that it is important for the ERPPS to be implemented after the completion of the Central-Wanchai Bypass. This is to ensure that drivers and commuters have the option of an alternative route that passes through Central and is free of charge. However, members have expressed concerns that the convenience provided by the new bypass may encourage more vehicles to enter the district. Meanwhile, members consider it useful if the Government could provide more data and information on the estimated traffic flow for the bypass and monitor, on an ongoing basis, impacts of the ERPPS on the bypass and other public transport networks such as the MTR, particularly when the South Island Line and the Shatin to Central Link come on stream.

### **Cost-Benefit Analysis**

7. As an extension of the preceding point, a proper and detailed cost-benefit analysis should be carried out and the results be made available to the public to facilitate a better understanding and discussion of the merits and demerits of implementing ERP. Although the evidence as currently presented suggests that ERP offers an effective solution on traffic congestion, more empirical data should be provided to justify such an undertaking.

8. We refer, in particular, to the consultation paper's use of statistics for the three indicative cities after the first year of ERP implementation as a benchmark. Although their experience shows that ERP is effective, it would be more useful and informative to also look at ERP performance over a longer period.

9. This is of particular relevance as ERP relies fundamentally on the application of financial disincentives to modify and regulate driving behaviour. It is noteworthy that despite a high first registration tax on motor vehicles in Hong Kong, vehicle numbers have continued to grow. The Government should also be mindful of the potential resistance from the general community, which may harbour suspicions that ERP may be nothing more than another fiscal instrument for generating additional revenue.

10. The Chamber is pleased to contribute further views on the scheme as and when the Government consults the public again on ERP implementation.

Yours sincerely,

Shirley Yuen  
CEO

cc: Mrs Ingrid Yeung, Commissioner for Transport, Transport Department  
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**SUN CHEONG TRANSPORTATION HONG KONG CO. LTD.**  
**新昌運輸香港有限公司**

敬啟者:

就政府計劃於中環及其鄰近地區，實施電子道路收費先導計劃，昨日起就收費區範圍、收費水平及時段等細節諮詢公眾，公告期三個月，本公司認為計劃應可針對為『中環區』服務的設置總站之公共交通工具作出“豁免徵費”，以提高公交使用率，特別是綠色專線小巴、巴士及其他公共交通工具，由於固定的路線、班次服務均由 運輸署 規管批出，故並非造成交通擠塞的主要原因。

據 運輸署 網站的資料，本港私家車數量自 2010 年起，每年都增加約 5%，本港私家車數目已突破 50 萬輛，按每年增長幅度約 5%，截至去年 11 月，登記私家車共 515,549 輛，比前年同期增加了 4.6%。建議政府相關部門應妥善管制私家車數量與增長速度，從而研究在部份快速公路及主幹路實施電子道路收費的可行性，這並非為解決交通擠塞問題的方法。

電子道路收費是一種解決道路擠塞或空氣質素的管理手段，目的是壓抑非必要的交通需求，基於使用者付費的原則，向在指定時間駛進指定區域的車輛收取費用。但由於香港政府未有強制每年發出的新私家車、電單車和客貨車及非公交車輛牌照，有部分 7 人私家車、客貨車、中港貨車等司機，在中環主要幹道違法停泊候車或停在路中心上卸貨，嚴重阻塞交通，而港島區違泊情況亦非常嚴重，推行電子道路收費系統的最主要目的是希望解決交通擠塞的問題；然而，特別在主要

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道路路段，路面車輛多導致行車速度緩慢，是否實施收費就能改善擠塞問題？若使用擠塞道路的車輛主要是「搵食車」、公共交通，電子道路收費未必能解決交通擠塞問題，反而會令市民平白多付了錢。相比於電子道路收費，鼓勵大眾盡量使用公共交通工具及適量的步行似乎更為有效。因應中半山區近年急速發展重建，引致非商用車輛經常違例泊車，電子道路收費未必能解決交通擠塞問題，較有效的辦法可能是禁止某些車輛進入，不然收費最終只會增加有關市民的負擔，令民怨加重。政府應該致力改善車多路少引致嚴重擠塞問題，而非用錢來增加市民負擔來解決問題。

此呈  
運輸房屋局  
運輸署

新昌運輸香港有限公司  
(黃偉倫代 行)

2016年 3 月 16 日



## 對《中環及其鄰近地區電子道路收費先導計劃》

### 公眾參與文件的回應

運輸及房屋局（下稱運輸當局）在 2015 年 12 月發表了《中環及其鄰近地區電子道路收費先導計劃》公眾參與文件（下稱文件），建議香港考慮採用道路收費計劃的方式（下稱收費計劃）來改善道路交通擠塞的問題。對於這項建議，汽車交通運輸業總工會（下稱本會）極為關注，並在參考交通諮詢委員會（下稱交諮會）於 2014 年 12 月發表的《香港道路交通擠塞研究報告》（下稱研究報告）以及收集整理會員的意見後，認為文件所提出的建議不但未能確保本港的道路交通暢通無阻，而且會造成衝擊廣大職業司機生計和業界運作混亂等問題，故本會對文件所提議的收費計劃持反對立場。

為了更好地表達廣大職業司機的訴求，本會作出下述回應。

1. 舊調新彈：一直以來，運輸當局都主觀地希望落實電子道路收費計劃，並且作過三次嘗試，可是均遭到社會和業界人士的強烈反對而無奈作罷。從這次情況來看，本會認為運輸當局使用改善道路交通擠塞作為推行收費計劃的借口，並且堆砌一大堆理由來試圖壓制反對聲音，結果使廣大職業司機感到這只不過是一種「換湯不換藥」的手法，根本無法爭取到他們的支持。
2. 挑精選肥：交諮會在 2014 年 12 月向政府提交的研究報告中，就如何解決本港道路交通擠塞的問題提出 12 項短至長期的建議措施。可惜的是，運輸當局只是採取大幅調高定額罰款和推行收費計劃的建議，簡單粗暴地將改善道路交通擠塞的重擔推到廣大職業司機身上，使他們本已捉襟見肘的生計遇到更大壓力，因此引起司機們的不滿和反對乃是必然之事。

3. 揚湯止沸：根據研究報告的內容，造成本港道路交通擠塞的核心問題在於運輸當局未能有效地控制私家車數量和增長速度。事實上，在過去十年間，私家車的數量已經增加大約40%，而其佔領牌車輛總數的比率在2013年已經達到70%。相反來說，非專利巴士和貨車的數量只有溫和的增長，與社會經濟發展相適應。誠然，讓廣大的士和公共小巴司機氣結的是，在運輸當局長期沒有增發牌照之下，的士和小巴的數量更是一直維持在零增長。不僅如此，在運輸當局交通政策失當、行業營運環境轉差、業界出現惡性競爭等因素的衝擊下，這兩個車種的實際運作數目更出現負增長的現象。此外，在運輸當局加大力度來推動巴士路線重組之下，全港專營巴士於過去十年間（2004至2013年）更由大約6,000部減至5,800部。由此來說，運輸當局有意透過推行計劃來解決道路交通擠塞的問題，無疑令職業司機比其他人承受更多和更大的不必要壓力，故對他們十分不公平。
4. 舉措失當：由於本港現時只有不足40萬個住宅泊車位，根本無法滿足整體接近48萬輛領牌私家車的需要。在這種情況下，文件有意推行收費計劃的商業中心區域中，如中環的雪廠街、畢打街、遮打道和美利道等道路便長期存在著嚴重非法泊車的問題，不但導致這些地區的交通擠塞長期無法得到解決，也給職業司機的營運帶來諸多不便。可惜的是，運輸當局沒有正本清源地解決這個問題，而只是一門心思地想推行收費計劃，結果只會事與願違。
5. 殃及池魚：雖然文件表示運輸當局已經採取三管齊下的方法，包括增發定額罰款通知書來處理交通擠塞的問題，可是在日常運作中，司機們往往看到一些財大氣粗的私家車主（俗稱老闆車）為了個人方便而無懼定額罰款，而警方也沒有相應地增多和加大執法力度，使上述多個路段的交通擠塞問題一直無法得到解決。由此來說，本會認為運輸當局沒有對症下藥，而一味鼓吹收費計劃，勢令司機產生殃及池魚之感。
6. 造次行事：在沒有替代路線的影響下，現時所有沿港島東西方向行駛車輛都被迫要經過中環，在頗大程度上加劇該區的道路擠塞問題。對此，文件指出，在中環灣仔繞道通車後，將可提供一條免費替代路線，供起點和終點並非中

環及其鄰近地區的駕駛者繞過收費區，同時令收費計劃可以只向駛進收費區的車輛收費。可是，運輸當局並沒有提及這條替代路線可以分流車輛的數量。倘若這條替代路線能夠有效地疏導中環地區的交通壓力的話，那麼很容易讓人感到收費計劃只不過是一個運輸當局斂財手段而已。

7. 巧取豪奪：文件毫不諱言地指出，「我們需要訂立一些量化指標（例如收費區在收費時段交通流量的減幅及相應增加的平均行車速度），以評估「中區電子道路收費先導計劃」的成效。評估結果可為公眾和政府提供有用的資料，考慮是否及如何將電子道路收費計劃擴展至本港其他地方，以紓緩當區的交通擠塞」。這種說法無疑引起廣大職業司機很大憂慮。主要原因是，在運輸當局挖空心思地推行收費計劃後，很可能再利用各種借口，將計劃逐步擴展到灣仔、銅鑼灣、尖沙咀和旺角等等地區。屆時，整個汽車交通運輸業的營運成本將會大增，而整個行業的生存空間也會大為萎縮，因此司機們都對收費計劃產生強烈的抵制情緒。
8. 管中窺豹：礙於資源所限，本會無法和運輸當局一樣，收集更多世界各地推行收費計劃的資料。可是，從文件所選取的海外經驗，即新加坡、倫敦和哥德堡來看，不難令人感到其間有著很大傾向性和引導性。事實上，除了前述三個城市以外，文件沒有列出所有推行收費計劃的城市供持份者參考，因此令人質疑可能世界各地只有這三個城市使用收費計劃。從另一方面來說，在我們普遍的經驗中，很多人口稠密的大城市，如紐約、東京、首爾、莫斯科、聖保羅、伊斯坦堡和墨西哥城等等都長期存在著嚴重交通擠塞問題，可是它們都沒有在市中心區推行收費計劃。如果我們再簡單地檢視內地的情況，更可以看到北京、天津、上海、西安、成都、武漢、廣州和深圳等大城市，都沒有一座城市使用收費計劃。即使被戲稱為「首堵」的北京，在也只是採取單雙號限行的措施，沒有使用這種收費計劃。由此來說，文件所引用的海外經驗，實在難以令廣大司機信服。

9. 理據片面：承接上點，對於這三個推行收費計劃的城市，文件似乎刻意地說明採用這種方式的好處。可是，當我們根據文件所提供的資料來檢視這些城市的收費計劃成效時，不難發現它們的初期成效也只不過是降低收費區域的交通流量15-16%左右。與此同時，由於文件沒有說明這三個城市的交通擠塞問題在實施一段時間是否出現死灰復燃的現象，再加上文件沒有客觀持平地指出一些使用這種收費計劃而沒有取得成效的城市例子（倘若有的話），令人感到運輸當局所引用的海外經驗過於片面。
10. 成本高昂：雖然文件指出海外收費計劃一般採用自動車牌識別和短距離微波通訊的技術，但是沒有說明使用這兩種技術的成本效益。事實上，由於短距離微波通訊的方式要預先在所有車輛內安裝無線通訊裝置，因而需要耗費大量安裝成本。若以每個通訊裝置需要500元港安裝費用的話，那麼本港的60萬登記車輛便要3億元。如果再加上其他設置和營運成本的話，必然使整項收費計劃出現投入成本高昂的問題。在這種情況下，倘若運輸當局強行落實收費計劃，很可能遇到收費過高而引起社會各界人士反對和收費不足以彌補開支而造成浪費公帑的兩難局面。在使用自動車牌識別科技方面，文件也承認會出現拍攝車牌可能引起社會人士對私隱方面的關注以及拍攝影像所顯示資料的準確度需要大量人手核對等問題，間接地承認這種技術不具成本效益。由此來看，本會認為文件提議的兩種技術在實際操作上所產生的效益成疑，甚至很可能出現比起因道路擠塞而造成的有形和無形成本高出許多的問題。
11. 問題叢生：在運作方面，文件並沒有評估推行收費計劃後可能出現的各種問題，如司機為減少營運負擔而不願意駕駛車輛進入收費區域，以及收費區域外圍的其他道路選擇不多，很可能形成收費區域外圍道路交通混亂的現象；由於生計艱難，不少司機為了降低營運損失，因此在進入收費計劃後不願意離開，結果增加收費區域裡的車輛總量及道路交通負擔；受到道路收費的影響，部份乘客可能不願意支付相關費用或款額問題，因而和司機產生摩擦等等，都在一定程度上達到減低收費計劃的成效。此外，文件也指出，受制於

中環及其鄰近地區的道路和行人路狹窄，剩餘空間有限，因此在收費區內設置額外路旁設備，不但存在著設置上的困難，而且對區內商戶和居民帶來負面影響，使收費計劃很可能淪為一個轉移問題的擾民措施。

12. 擾亂業界：對於職業司機來說，由於收費計劃完全忽略他們的營運需要，甚至造成很多生計上難題，因此必然引起他們的強烈反對。以的士為例，礙於文件多番強調用者自付的原則而無意提供任何豁免和優惠措施，那麼的士司機在運輸當局強行落實收費計劃之下，便會遇到很大運作難題。事實上，現時の士司機一般分為早更、夜更，特更和替工等多種參與形式，而同一輛の士也經常由不同司機駕駛及營運，因此在頻繁地進入收費區域後，一定會出現如何承擔費用的矛盾。與此同時，由於の士業採取司機租車營運的形式，再加上其間存有打埋人（即司機與車主之間的中介者），結果必然使支付收費問題變得更加複雜和困難。另一方面，儘管の士在中環及鄰近地區的交通流量中佔有較高比例，可是這是基於該區域的社會經濟運作需要所致。可惜的是，交諮會在其研究報告則刻意淡化的士的角色和作用，沒有公平地說明的士長期以來都是本港公共交通工具之一，更沒有指出的士在運輸當局推行發展鐵路幹線下所蒙受的衝擊，因此令人感到運輸當局有著偏頗的預定立場及引起的士司機的反感。此外，對於貨車和非專利巴士等車種，尤其是一些個體經營的司機來說，他們大部份都在營運需要的情況才駕駛車輛進入收費計劃所提及的區域。然而，在0運輸當局一意孤行地推行收費計劃後，司機們將遇到難以轉嫁成本的問題，結果嚴重衝擊到他們的生計。
13. 肆意曲解：交諮會在其研究報告中提出一項有助紓緩道路交通擠塞的措施是加強宣傳教育的工作，如制訂有效的整體計劃、讓市民們學懂遵守交通規則、理解和樂於使用公共交通工具、與運輸業界緊密合作、以及爭取職業司機的支持等等。可惜的是，運輸當局在動用大量公帑推銷文件時，不但絲毫沒有參考交諮會的建議，反而採用類似孤證的手法，將收費計劃包裝成解決本港道路交通擠塞的不二法門，顯然有欺瞞社會人士之嫌。



概括來說，本會認為，構成本港中環及其鄰近地區道路交通擠塞的主要原因在於運輸當局的交通政策失當所致，如未能有效控制私家車增長過速、沒有加強執法來清理非法泊車、以及無法解決區內泊車不足而引起路面交通負荷增大等等。可惜的是，運輸當局不但沒有對症下藥地解決這些問題，反而選擇性地使用增加收費的方式，結果在很大程度上增加廣大職業司機的營運負擔和造成他們的滿腹怨氣。相反來說，多個車種的數量多年以來在運輸當局的政策規限下都沒有出現任何增長，部份車種甚至因經營困難而出現實際營運數量逐漸減少的現象，因此廣大司機沒有接受收費計劃的義務。不僅如此，由於職業司機近年在運輸當局不合理的交通運輸政策下，生計受到很大衝擊，因此運輸當局使用這種毫不體恤他們處境的收費計劃必然引起司機們的強烈反對。

另一方面，由於文件有著很強引導性和預設立場，再加上沒有客觀地借用其他城市的經驗、合理地評估收費計劃的效益、認真地探討其他運作上的問題、以及有效地降低對職業司機營運和整個汽車交通運輸業運作的影響等，因此讓人感到整個文件取向偏頗和流於粗疏草率。在這種情況下，倘若運輸當局一意孤行地推行收費計劃的話，不但無助於解決本港道路交通擠塞的問題，而且很可能以貽笑大方收場。對此，本會認為運輸當局必須立即擱置收費計劃，不作進一步討論。

為了更加全面地反映本會會員所面對的困難和訴求，本會十分希望 局長閣下能在百忙之中撥冗與本會代表於短期內舉行專題工作會議，以便聽取他們的意見和建議，然後責成相關部門著手跟進，從而協助廣大前線司機解決難題。至於會議的時間和地點方面，則聽任 局長閣下安排。未知如何，敬請示覆。

如有任何查詢，敬請賜電 與本會第主席陳兆華先生（手機：  
）的士司機分會主任杜燊棠先生（  
）或貨運車分會主任孫浚誠  
（  
）或非專利巴士分會主任譚偉照（  
）聯繫。耑此，專祝  
鈞安



**汽車交通運輸業總工會**

2016年3月16日

P00015



香港個人資料私隱專員公署  
Office of the Privacy Commissioner  
for Personal Data, Hong Kong

保障·尊重個人資料  
Protect, Respect Personal Data

PCPD.org.hk  
Our Ref.:

16 March 2016

BY FAX ( ) & BY POST

Transport Department  
Room 3926, 39/F., Immigration Tower  
7 Gloucester Road  
Wan Chai, Hong Kong

Attn.: Mr. Alfred LAM, Chief Engineer/ Transport Planning

Dear Mr. Lam,

**Re: Public Engagement for Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas (“the Central District ERP Pilot Scheme”)**

Thank you for your letter dated 21 January 2016 providing preliminary information on the technologies for electronic road pricing, namely “Dedicated Short-range Radio Communication”, “Automatic Number Plate Recognition” and “Global Navigation Satellite System”, and how the privacy concerns may be addressed by the relevant technologies.

We enclose herewith, for your consideration, the Submission of the Privacy Commissioner for Personal Data, Hong Kong in response to the captioned public engagement exercise for the Central District ERP Pilot Scheme.

Should you have any queries regarding the above, please contact the undersigned at

Yours sincerely,

(Sandra LIU)  
Senior Legal Counsel  
for Privacy Commissioner for Personal Data, Hong Kong  
Encl.

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**PCPD's Submission in response to the**  
**Public Engagement for Electronic Road Pricing Pilot Scheme**  
**in Central and its Adjacent Areas**

This Submission is made by the Privacy Commissioner for Personal Data, Hong Kong ("PCPD") in response to the public engagement exercise carried out by the Transport and Housing Bureau in relation to the proposed Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas ("the Central District ERP Pilot Scheme"). As the regulator to protect individuals' privacy in relation to personal data under the Personal Data (Privacy) Ordinance, Cap. 486 ("the Ordinance"), the PCPD would like to provide comments on some of the issues raised from the perspective of personal data privacy protection.

**General comments**

2. The PCPD generally supports any proposal that aims at tackling road traffic congestion in Central and its adjacent areas. The PCPD also advocates the importance of embracing personal data privacy protection throughout the planning, implementation and reviewing of any scheme or infrastructure that may have an impact upon personal data privacy.

3. The PCPD acknowledges the free flow of information being one of the underpinning core attributes to the success of Hong Kong. The PCPD also

reiterates that there are circumstances under the Ordinance whereby personal data may be exempt from all or some of the provisions in the best interest of the public. The purpose of the Ordinance is to protect the privacy of individuals in relation to personal data. In other words, the Ordinance will apply if the operation of the Central District ERP Pilot Scheme involves the collection, use or retention of personal data<sup>1</sup>.

4. All the technologies mentioned in the Public Engagement Document for the Central District ERP Pilot Scheme involve revealing the location of vehicles entering into Central or its adjacent areas in some ways (e.g. capturing the number plate of a vehicle in certain circumstances<sup>2</sup>). While it may not be practicable to ascertain the identity of the registered owner directly from the captured data alone (i.e. vehicle registration mark), it is possible to identify the individual owner indirectly through the Register of vehicles maintained by the Transport Department. As a result, there is a potential loss of anonymity and a risk of compiling the travel profile of an individual (i.e. the vehicle owner or the person who constantly travels with a particular vehicle, especially a celebrity), and that individual may be tracked or monitored through the collection, storage and aggregation of the relevant data. Hence, the authority that controls the collection, holding, processing or use of personal data under the Central District ERP Pilot Scheme must comply with the requirements under the Ordinance, in particular, the six Data Protection Principles (DPPs) in

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<sup>1</sup> Under the Ordinance, "personal data" means any data – (a) relating directly or indirectly to a living individual; (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and (c) in a form in which access to or processing of the data is practicable.

<sup>2</sup> The number plate of a vehicle will be captured – (1) whenever the vehicle enters the charging area during the charging period under the Automatic Number Plate Recognition technology; or (2) when payment cannot be made successfully under the Dedicated Short-range Radio Communication technology.

Schedule 1<sup>3</sup>.

**Specific comments on the Public Engagement Document**

5. In the ensuing paragraphs, the PCPD provides further comments on specific questions as raised in the Public Engagement Document which may have implications on personal data privacy, including the charging mechanism (Question 3), technology (Question 9), other privacy concerns (Question 10) and the indicators to evaluate the effectiveness of the Central District ERP Pilot Scheme (Question 11). For those questions which concern the other implementation details of the Central District ERP Pilot Scheme, such as the charging area, charging period, charging level and exemption, etc., the PCPD would make no submission thereon.

***Q3 Do you prefer an area-based or cordon-based charging mechanism for the Central District ERP Pilot Scheme? Why?***

6. Two common types of charging mechanism, namely, *area-based* and *cordon-based* approaches, are raised in the Public Engagement Document to solicit public views.

7. Under an *area-based* charging mechanism, motorists are only required to pay once per day and could enter and re-enter the charging area without

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<sup>3</sup> The six DPPs form the cornerstone of the Ordinance and govern respectively data collection, data accuracy and retention, use of data, data security, transparency of data policy and data access and correction rights.

having to make further payment on the same day<sup>4</sup>. Under a *cordon-based* charging mechanism, a vehicle is charged every time it crosses a charging point of the charging area during the charging period<sup>5</sup>. It allows the charging level to vary based on time, location, and travel direction. It is raised that the charging of daily rate (i.e. the area-based charging mechanism) may not be equitable to all motorists as it disregards the travel distance or duration within the charging area and thus not effective in tackling traffic congestion problem. Some argue that *cordon-based* charging mechanism is a more equitable approach in line with the “*user pays*” principle.

8. Given that there is no strait jacket in solving congestion problems, the choice is a decision after taking into account different factors when assessing the two approaches so as to achieve the ultimate goal of the Central District ERP Pilot Scheme. Effectiveness, fairness and privacy-friendliness are the relevant factors in considering which of these approaches is more preferable. In this regard, the PCPD notes that the use of satellite technology for *area-based* approach in tracking vehicles will enable the aggregation, matching and further processing of data in the public domain (i.e. owners’ details in the Register of Vehicles), thus creating travel profiles of individuals and making surveillance possible. Besides, there are risks of “*function creep*”, where data collected for one purpose is gradually used (often with advancement of technology and application of further techniques) for new purposes beyond what was originally envisaged or legitimated. However, the use of satellite technology in either tracking the “*distance*” or “*time*” of the vehicles staying

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<sup>4</sup> See paragraphs 3.2.3 and 4.2.5 to 4.2.9 of the Public Engagement Document.

<sup>5</sup> See paragraphs 3.2.2 and 4.2.10 to 4.2.12 of the Public Engagement Document

in the charging area may only help solve some but not all congestion issues. As pointed out by the Administration in the Public Engagement Document, the satellite technology is not yet mature. The PCPD urges the Administration to adopt less privacy-intrusive options when designing the Central District ERP Pilot Scheme and to strike a proper balance in serving public interest.

***Q9 Dedicated Short-range Radio Communication (DSRC) technology requires the installation of an In-vehicle unit (IVU) in each vehicle entering the charging area for ERP payment, while Automatic Number Plate Recognition (ANPR) technology captures the licence number plate of a vehicle every time when it enters / leaves / circulates in the charging area. On the whole, would you say that ANPR or DSRC is a more preferable technology for the Central District ERP Pilot Scheme?***

9. Both the ANPR and DSCR technology will involve installation of roadside hardware for detection of vehicles entering, exiting and being used within the charging area as well as for enforcement purpose (i.e. for recovery of payment). From personal data protection point of view, the PCPD urges the Administration to adopt technology that is more privacy-friendly for the Central District ERP Pilot Scheme.

10. The ANPR technology captures images of the number plates of all vehicles in the charging area during the charging period. As explained in paragraphs 4 and 8 above, the vehicle registration marks, when combined with other identifiable information of the individual owners obtained from the

Register of Vehicles maintained by the Transport Department, may enable the identities of the vehicle owners to be ascertained and thus building up their travel profiles. The building of travel profile will render an individual more vulnerable to privacy risks.

11. The PCPD is further concerned that ANPR technology may be used as policing tools by law enforcement agencies, as demonstrated in the London Congestion Charging Scheme. The London Scheme was introduced in central London in 2003 using ANPR technology. The ANPR cameras were originally installed for implementing the London Scheme but the data was subsequently shared with the Metropolitan Police for national intelligence purposes<sup>6</sup>. The Metropolitan Police is able to track all vehicles entering central London by having real-time access to all ANPR cameras. While such data sharing arrangement is considered by the UK Information Commissioner's Office as arguably legitimate and beneficial to the national security, it goes beyond the original purpose for which the ANPR cameras were installed. In Hong Kong, the crime exemption under section 58 of the Ordinance will only apply on a case by case basis. From the perspective of data privacy protection, the PCPD recommends that the Administration should be mindful in considering whether massive collection of data is justified in the first place.

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<sup>6</sup> See the "*Information Commissioner's report to Parliament on the state of surveillance*" published in November 2010, available at: <https://ico.org.uk/media/about-the-ico/documents/1042386/surveillance-report-for-home-select-committee.pdf>.



12. It is pointed out in the Public Engagement Document that the DSCR technology will provide a greater degree of privacy<sup>7</sup>. An ERP scheme using DSRC technology requires the installation of an IVU in a vehicle to enable instantaneous payment when passing through an ERP gantry. The number plate of the vehicle will be captured only if payment cannot be made successfully. The ERP payment is made via a pre-payment card, a credit card or other kinds of contactless card inserted into the IVU. In the circumstances, it appears that personal data privacy would be better protected if the ERP payment is to be made via a pre-paid anonymous card (similar to a standard Octopus card).

13. In any event, the PCPD acknowledges that the crucial point is to allow an individual to freely choose the payment method under the DSCR technology, even if such method (such as credit card) may result in a loss of anonymity. That said, the operator of the Central District ERP Pilot Scheme should ensure that an individual is fully aware of the privacy risks associated with each payment method so that he can make an informed choice. It appears that the technical details on the operation of the payment system is not made clear in the Public Engagement Document, e.g. whether and if so what data will be stored in the IVU device and what data will be collected by the operator of the Central District ERP Pilot Scheme in securing payment. The PCPD would invite the Administration to further explain the operational details for further assessment of privacy risks, if any.

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<sup>7</sup> See paragraph 3.2.10 of the Public Engagement Document.

*Q10 Do you have any concern over the protection of privacy in the Central District ERP Pilot Scheme? What are your concern(s) and how do you think it / they could be addressed?*

*Harness privacy risks through Privacy Impact Assessment*

14. As the proposal is still in its infancy, the PCPD suggests that a Privacy Impact Assessment should be conducted to identify potential risks involved in the Central District ERP Pilot Scheme which affects personal data privacy of the general public. Although not a statutory requirement, Privacy Impact Assessment is a valuable tool to systematically evaluate the privacy risks associated with a proposal with an objective of avoiding or minimizing adverse impacts<sup>8</sup>. Furthermore, the PCPD recommends the Administration should adopt a *Privacy-by-design* approach in harnessing the privacy risks from development to implementation of the relevant system or scheme.

15. In view of the fact that the Administration will engage a consultant to conduct feasibility study to assess different options in the next round of public consultation, the PCPD expects more information will be provided on the technical operation of the different technologies and how the privacy risks will be minimized.

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<sup>8</sup> For further details, see the "*Information leaflet on Privacy Impact Assessment*" issued by the PCPD available at:  
[https://www.pcpd.org.hk/english/resources\\_centre/publications/files/InfoLeaflet\\_PIA\\_ENG\\_web.pdf](https://www.pcpd.org.hk/english/resources_centre/publications/files/InfoLeaflet_PIA_ENG_web.pdf)

*Other Privacy Concerns*

16. Apart from conducting a Privacy Impact Assessment as recommended, the PCPD takes the view that, irrespective of the kinds of technology or charging mechanism to be adopted in the Central District ERP Pilot Scheme, the operator of the Central District ERP Pilot Scheme must comply with the Ordinance in the collection and subsequent handling of personal data. The relevant DPPs and requirements under the Ordinance are highlighted below.

*(i) No Excessive Collection of data*

17. Personal data collected should be adequate, necessary but not excessive<sup>9</sup> for the purpose of the Central District ERP Pilot Scheme. The best way to protect personal data privacy is to ensure personal data shall be collected only when it is necessary and less privacy-intrusive alternative is not available.

*(ii) Notification before Collection of data*

18. If collection of personal data is inevitable in the implementation of the Central District ERP Pilot Scheme, the Administration should ensure that on or before collection of personal data, the individual is notified of the purposes of collection and the classes of persons to whom his personal data may be

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<sup>9</sup> DPP 1(1)

transferred<sup>10</sup>. This may be done by way of a Personal Information Collection Statement provided to the vehicle owner at the time of application for registration and licensing of a vehicle, or before the installation of an IVU. The Administration may also consider specifying the requisite information to be notified to the applicant in the future legislation for the Central District ERP Pilot Scheme.

*(iii) Retention of Data*

19. Personal data collected under the Central District ERP Pilot Scheme should not be kept for a period longer than is necessary to fulfil the original collection purposes<sup>11</sup>, say processing payment record and taking follow-up action for outstanding payment. Practical steps must be taken to ensure that data which is not required to fulfil the original purpose(s) shall be erased<sup>12</sup>. It is advisable that the Administration would formulate a data retention policy and ensure strict compliance thereof.

*(iv) Use of Data*

20. Personal data collected must only be used for the purpose for which the data is collected or for a directly related purpose, unless voluntary and explicit consent is obtained from the individual (i.e. data use principle)<sup>13</sup>. Further, any subsequent transfer or disclosure of the data to any third party,

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<sup>10</sup> DPP1(3)(b)

<sup>11</sup> DPP2(2)

<sup>12</sup> Section 26 of the Ordinance

<sup>13</sup> DPP3(1) and (4)

including other government departments and law enforcement agencies, must be consistent with the original collection purpose or a directly related purpose, unless with consent of the individual or any exemption provisions under the Ordinance apply<sup>14</sup>. Before invoking any exemption provision under the Ordinance to disclose personal data collected under the Central District ERP Pilot Scheme to government departments or law enforcement agencies, it is pertinent that reasonable enquiries should be made with the relevant department or authority to ascertain if non-disclosure of the data would be likely to prejudice the exempted purposes. Such enquiries should generally cover the reasons why the individual's consent is not obtained, the purpose for which the requested data is to be used and why such purpose is likely to be prejudiced by the non-disclosure of the data pursuant to the data use principle, etc.

(v) *Security of Data*

21. All reasonably practicable steps must be taken to ensure that personal data is protected against unauthorised or accidental access, processing, erasure, loss or use<sup>15</sup>. In view of the privacy risks associated with the misuse of personal data, it is recommended that the Administration should develop managerial and operational policies, guidelines and procedures to ensure confidentiality and integrity of the data and accountability of those who handle

<sup>14</sup> For example, under section 57(2), personal data is exempted from the provisions of DPP3 if the use of the data is for the purposes of safeguarding security, defence or international relations in respect of Hong Kong. Also, personal data to be used for the purpose of prevention or detection of crime, etc. may be exempted under section 58(2). It is to be noted that invoking an exemption under section 57(2) or 58(2) is subject to a prejudice test, i.e. whether the application of DPP3 in relation to the intended use of the data would be likely to prejudice any of the purposes specified in the exemption provisions.

<sup>15</sup> DPP4(1)

it.

(vi) *Outsourcing of Personal Data*

22. If a contractor is engaged to handle personal data, the Administration should also adopt contractual or other appropriate means to prevent any personal data transferred to the contractor from being kept longer than is necessary for processing the data<sup>16</sup>; and to prevent unauthorised or accidental access, processing, erasure, loss or use of the data transferred<sup>17</sup>. In this connection, the PCPD has issued the *“Information Leaflet on Outsourcing the Processing of Personal Data to Data Processor”* to provide guidance on a data user’s obligations<sup>18</sup>.

23. If personal data will be transferred to a place outside Hong Kong, due consideration must be given to section 33 of the Ordinance (on prohibition against cross-border data transfer except under prescribed conditions). Although section 33 of the Ordinance is not yet effective, it is prudent to follow the relevant guidance issued by the PCPD<sup>19</sup>. The purpose of section 33 is to ensure that the transferred personal data will be afforded with an equivalent level of protection as the Ordinance. It is to be noted that storing personal data in the cloud may also constitute a transfer outside Hong Kong if the cloud server is accessible outside Hong Kong. The operator of the Central District

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<sup>16</sup> DPP2(3)

<sup>17</sup> DPP4(2)

<sup>18</sup> The Information Leaflet is available at:

[https://www.pcpd.org.hk/english/resources\\_centre/publications/files/dataprocessors\\_e.pdf](https://www.pcpd.org.hk/english/resources_centre/publications/files/dataprocessors_e.pdf)

<sup>19</sup> See PCPD’s *“Guidance on Personal Data Protection in Cross-border Data Transfer”*, available at: [https://www.pcpd.org.hk/english/resources\\_centre/publications/files/GN\\_crossborder\\_e.pdf](https://www.pcpd.org.hk/english/resources_centre/publications/files/GN_crossborder_e.pdf)

ERP Pilot Scheme should be mindful of its obligations under section 33 of the Ordinance if cloud service provider would be engaged to store and/or process personal data collected under the Central District ERP Pilot Scheme.

*Q11 What indicators do you think we should use to evaluate the effectiveness of the Central District ERP Pilot Scheme?*

24. The PCPD submits that the effectiveness of the Central District ERP Pilot Scheme should be evaluated by both quantitative and qualitative indicators. Generally, an effective solution to tackle traffic congestion problem which is widely accepted by the society should not compromise data privacy rights. In considering an option for the Central District ERP Pilot Scheme, the Administration is invited to strike a proper balance between the effectiveness of that option in improving traffic condition (to be measured by quantitative indicator such as traffic speed) and its implications on personal data privacy (to be assessed by qualitative indicators, say the overall impression of the public on whether their personal data privacy is respected under the Central District ERP Pilot Scheme).

### **Concluding Remarks**

25. The Ordinance is technology-neutral. The PCPD urges the Administration to examine and incorporate personal data privacy protection measures when taking forward and designing the Central District ERP Pilot Scheme. In this regard, the PCPD stands ready to provide further views on

the privacy-related issues as the Central District ERP Pilot Scheme develops.

*Privacy Commissioner for Personal Data, Hong Kong*

*March 2016*





香港電車  
HONG KONG TRAMWAYS

P00016

Your Ref:

Our Ref :

16 March 2016

Mr. CHAN Chi Pong, Steven  
Senior Transport Officer / Wan Chai  
Transport Department  
37/F, Immigration Tower,  
7 Gloucester Road,  
Wan Chai,  
Hong Kong

Dear Mr. Chan,

**Submission by Hong Kong Tramways on  
“Electronic Road Pricing Pilot Scheme in Central and its Adjacent Area”**

With reference to the public engagement exercise on “Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas”, please find enclosed the submission by Hong Kong Tramways.

Being a major road transport operator, Tramways feels obliged to express our views and give feedback to the proposed scheme. We look forward to a fruitful public discussion that would be conducive to formulating and implementing policies to alleviate the chronic road traffic congestion problem of our city.

Should you have any queries or require any additional information, please feel free to contact me on

Yours sincerely,  
HONG KONG TRAMWAYS, LIMITED

Benjamin Lee  
Operations Manager

Encl.

**Hong Kong Tramways, Limited**

*A member of RATP Dev Transdev Asia*



香港電車

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**Public Engagement on  
Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas**

**Submission by Hong Kong Tramways**

With reference to the public consultation exercise on “Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas”, Hong Kong Tramways is writing in support of the proposed pilot scheme. Being a major road transport operator, Tramways welcomes any policy that could help to tackle road traffic congestion so that passengers using public transport could enjoy quicker, smoother and greener rides.

As Hong Kong is walking towards transforming itself into a more sustainable and liveable city, giving more priority for public transport must be the future trend. Recently the community is engaging in an active discussion on seeking practical ways in tackling the serious road traffic congestion. In fact, demand-side traffic management schemes are becoming the norm in the world’s leading cities; either by increasing the cost of car usage or by reducing the space allocated to cars /posing constraints to car usage (or both). Cities like London, Paris, New York, Singapore, Beijing, Seoul have all adopted such demand management schemes, using different methods. The corollary of this demand management measures are an encouragement in the use of public transport; and a different trade-off giving more space and/or financial resources to public transport means. We believe that HK is facing similar (or in fact more acute) traffic congestion challenges as in other world leading metropolis, and therefore traffic management measures should be actively considered.

As a major public ground transport service provider on the island side, Hong Kong Tramways experiences impediments in operation efficiency especially during peak traffic hours. The commercial speed of tram could go up to 21.7 km/h, e.g. on the exclusive tram lane at Admiralty, but the average commercial speed of trams (including time at stops, traffic lights, etc.) is now only about 8 km/h. Tramways’ commercial speed had been decreased by 20% over the past 5 years because of increasing congestion. This increases almost proportionally our operating costs, decreases our carrying capacity and our attractiveness, and exposes our citizens to dangerous levels of pollution caused by idle engines exhausts.

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While acknowledging the technical complexities and divergent views regarding the introduction of a congestion charging scheme, we are supportive of traffic demand management measures in general. According to Government's paper, the Transport Advisory Committee ("TAC") has conducted a study to identify the factors contributing to traffic congestion in Hong Kong and put forward recommendations to the Government that "Electronic Road Pricing ("ERP") is an effective traffic management tool to tackle localized traffic congestion and that the Central District is a suitable location". In fact, according to Tramways' study along the busiest road sections in Central by a transport consultancy MVA in 2012, noticeable traffic congestion was observed during the afternoon period in the eastbound direction of DVRC. The bottleneck section is observed to be between Jubilee Street and Pottinger Street. The study of TAC reflects that among other things, ERP is conducive to enhance traffic mobility in the charging area and improve operating conditions and efficiency of road-based public transport. We would therefore support a pilot scheme in Central.

While Tramways welcomes the idea of congestion charging in principle, we would like to highlight that Tramways is the most eco-friendly road surface public transport serving 200,000 passengers daily, and at the same time, the most space-efficient road surface public transport: one average private car user consumes 90 times more space than a tram user (including space for parking). Excluding Parking, Tram passenger consumes ~10 times less space than private car user. In this connection, we would like to emphasize that exemption from charge should be given to tram service under the ERP scheme.

On the other hand we believe that traffic congestion must be approached in a holistic manner. Our aforementioned transport study which was fully financed by Tramways at the cost of HK\$1million includes extensive surveys on the major congestion black spots along the tram line and proposes solutions to benefit all traffic without worsening any subgroup of road users. In the meantime, there can be some "quick wins" that could be considered in order to enhance the space and operational efficiency of the city's road surface transport. For example:

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- We support resuming more tram and bus-only traffic lanes for encouraging people to use public transportation. With the opening of the WIL and the new Central-Wanchai bypass, which will free up more road space in the busy traffic areas, it will definitely be conducive to achieve the highest efficiency use of road space by introducing more priority measures to facilitate public transport, including resuming more tram dedicated lanes and synchronizing traffic lights.
- We recommend encouraging on-street loading and unloading outside peak hours - Measures should be taken to provide incentives to encourage operators and traders to carry out the loading and unloading activities outside peak hours.
- Recently, some professional and community groups have proposed to rezone Des Voeux Road Central largely to a pedestrian with an environmentally friendly public transport system. Tramways is of the view that by giving more priority to public transport and promoting green environment, this proposal is a good vision for the city.
- Unregulated curb side activities are reducing the usable space of the roads and causing traffic bottlenecks. As the inside lane is occupied by illegal parking and waiting vehicles, loading / unloading activities are forced to take place in the second lane, rendering only one lane left for traffic in a three-lane carriageway. We therefore advocate stepping up enforcement of traffic violations. In order to have continuous deterrence effect automatic surveillance technology could be explored to bring about persistent enforcement effects, similar to red light and speeding.

Tramways therefore believes that it is in the interest of the sustainable development of our city to actively study on how to achieve such initiatives, to prioritize the measures according to their effectiveness and public acceptability; and to implement the necessary measures or proposed pilot schemes the soonest. We welcome providing input to this public discussion.

Date: 16<sup>th</sup> March 2016

**Hong Kong Tramways, Limited**

*A member of RATP Dev Transdev Asia*

17 March 2016

Transport Department  
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[info@erphk.hk](mailto:info@erphk.hk)

Submission to the Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas Public Engagement Document

Dear Sir/Madam,

The Transport and Housing Bureau (THB) of the Government of Hong Kong Special Administrative Region (HKSAR) launched a 3-month engagement in mid-December 2015 to gauge views of the public on the Electronic Road Pricing (ERP) Pilot Scheme in Central and its Adjacent Areas. The Canadian Chamber of Commerce in Hong Kong, the "Chamber", would like to take the opportunity to submit its views for your consideration. We first set out our general views followed by more specific opinions and responses for the 13 specific questions in the public engagement document.

General Views of the Chamber

1. The Chamber agrees that road traffic congestion problem undermines Hong Kong's mobility, connectivity and liveability by lengthening travelling time on roads and its corresponding impact on roadside air quality and personal health.
2. The experiences of Singapore, London and Gothenburg, although they each have unique circumstances, in implementing ERP for effective road demand management in targeted areas with severe traffic congestion provide good references for Hong Kong in tackling its traffic problems.
3. We believe that an ERP scheme, if well planned and designed, can bring about social, economic and environmental benefits to Hong Kong to underpin its sustainable development.
4. A scheme effectively lowering vehicular demand for road use in Central and the adjacent areas can alleviate traffic congestion.

5. With a better traffic conditions, roadside emissions from motor vehicles in Central and the adjacent areas can be reduced, improving roadside air quality in that localised area. This will, in turn, reduce health impacts due to poor roadside air quality.
6. NO<sub>x</sub> emissions from motor vehicles have a great impact on roadside air quality.<sup>1</sup> Beside Central, a number of districts such as Kwun Tong, Sham Shui Po, Kwai Chung, Causeway Bay and Mongkok also suffer from poor air quality with NO<sub>x</sub> concentrations exceeding the AQO limit. We therefore opine that further consideration should be made for extending the Scheme to other areas including these aforementioned districts subject to detailed feasibility studies and results of the pilot in Central district.
7. Poor roadside air quality also impacts the city's tourism industry and its associated revenue as well as increases the difficulty for businesses to attract talent to Hong Kong. This contributes to the reduction in the city's overall competitiveness.<sup>2</sup> Improving roadside air quality through various approaches including an ERP scheme will help reinforce the overall competitiveness of Hong Kong in terms of its attractiveness to tourists, talent and businesses.
8. The Chamber broadly supports the introduction of ERP to promote the sustainability in the core business district in Central. However we are also mindful of the unintended consequences from a real estate values and rents perspective that may happen in Central as was the case with Singapore. (A recent paper written on the effects of the ERP rate hike in November 2010 on retail, office and residential real estate prices concluded that there was a 19% drop in retail real estate prices within the cordon ERP areas relative to retail real estate prices outside the cordon ERP areas. However, the toll rate hike had no significant impact on private office and residential real estate within cordoned ERP areas). The Government is advised to address the concerns from the property stakeholders in particular retail real estate while implementing the ERP.

#### Specific Views on the 13 Questions in the Public Engagement Document

While we have set out our overall views on an ERP scheme in Central and the adjacent areas, we provide below our initials thoughts on the 13 specific questions in the engagement document.

#### (A) Charging Area

Q1 *Do you have any views on how the boundary of the Central District ERP Pilot Scheme should be drawn up, and what are your reasons?*

Background materials for Q1 & Q2 (Para 33 of executive summary):

When drawing up the exact boundaries, the Government should take into account

<sup>1</sup> "A Report on the results from the Air Quality Monitoring Network (AQMN) (2014)" published by EPD. ([http://www.aqhi.gov.hk/api\\_history/english/report/files/AQR2014e\\_final.pdf](http://www.aqhi.gov.hk/api_history/english/report/files/AQR2014e_final.pdf))

<sup>2</sup> The Chamber's submission to Environment Bureau in February 2014 "Position Paper on Air Quality in Hong Kong" (<http://it.cancham.org/wp-content/uploads/2014/03/SDC-Air-Quality-Position-Paper-Submission.pdf>)

various factors, such as the level of traffic congestion, public views, technological requirements and physical constraints (e.g. the availability of road space for the erection of ERP gantries / poles). We understand that a more exact boundary will be developed under a feasibility study\* at the next stage for discussion by the public.

\*The Government has planned the following key steps in taking forward the Central District ERP Pilot Scheme: (1) public engagement (i.e. the current consultation); (2) feasibility study; (3) a further public engagement; (4) legislation for the pilot scheme; (5) funding approval; and (6) programme rollout.

#### Response

The Chamber agrees to the general approach outlined in the public engagement document that the HKSAR Government will take into account traffic congestion, public views, technological requirements and physical constraints (for the installation of ERP gantries) when drawing up the boundary for the Central District ERP Pilot Scheme.

Q2 *Do you think some neighbouring areas of Central, say some parts of Admiralty or Sheung Wan, should be covered in the Central District ERP Pilot Scheme? If so, which area(s)?*

#### Response

Given their proximity to Central, the Admiralty and Sheung Wan districts are also popular office areas with heavy road traffic. Subject to sufficient bypasses and drop-off points available adjacent to the ERP area, it is suggested that by setting the initial boundaries for the ERP Pilot using a more conservative / slightly wider coverage there is more optionality by responding with lower ERP charges on certain segments of the area (which alludes to the preference for a cordon-area mechanism in the following questions) than by setting the charging area too small and expanding later to cater for unexpected congestion on neighbouring segments. More details are needed in the upcoming feasibility Study. We note, as in the Singapore and Gothenburg schemes, it is logical to include feeder roads outside Central District.

Q3 *Do you prefer an area-based or cordon-based charging mechanism for the Central District ERP Pilot Scheme? Why?*

Background materials for Q3 (Para 35-37 of executive summary):

Area-based and cordon-based charging mechanisms are two common types of charging mechanisms. The former is used in London, whilst the latter in Singapore and Gothenburg.

Area-based charging mechanism:

A vehicle is charged at a daily rate for entering the charging area during the charging period, regardless of duration, distance travelled and number of entries. Roadside hardware is required for charging, with additional installation required within charging area (to detect vehicles solely travelling inside). It is simple and easily understood by motorists. However, some would consider that (1) it is not equitable, as it disregards duration and distance travelled; (2) it does not allow for different rates for different degrees of congestion; and (3) it may induce unnecessary entries.

Cordon-based charging mechanism:

A vehicle is charged every time it passes a charging point during the charging period. Charging level can be varied according to time of day, duration of stay, and this varying charge is more in line with the "user pays" principle. Some consider that it may induce undesirable travel behaviours, waiting / circulating until when charge is lowered (and means need to be in place to deter such situation).

Response

A cordon-based mechanism (as in Singapore and Gothenburg) is more in line with "user pays" principle due to its flexibility in charging rate design that better reflect time of day, location and travel direction. As such, it is our preferred option.

(C) Charging Period

Q4 *Do you agree that ERP charges for the Central District ERP Pilot Scheme should be imposed throughout the hours in a day when the traffic flow is high in the charging area?*

Background materials for Q4 & Q5 (Para 38 of executive summary):

The charging period should cover the periods when traffic in Central and its adjacent areas are busy and congested. On a weekly basis, the traffic flow there is very high throughout weekdays and Saturdays, while it is significantly lower on Sundays. On a 24-hour basis, there is high level of traffic on weekdays from 7am to 8pm and on Saturdays from 8am to 8pm. Therefore, it seems reasonable to set



the charging period for the Central District Scheme as 7 am to 8pm from Mondays to Fridays, and 8 am to 8pm on Saturdays, excluding public holidays.

Response

We agree that ERP charges should be imposed throughout the hours in a day when traffic flow is high in the selected charging area. We note that the charge should be set at a level high enough to discourage road usage during the high-flow hours thereby effectively reducing traffic volume in the selected charging area to an acceptable level. We suggest 8am-8pm on weekdays and 8am-5pm on Saturdays from the degree of congestion experienced. These charges can be adjusted in the future (albeit not too frequently to avoid confusion) to reflect changing traffic flows in the charging area and adjoining arterial roads.

- Q5 *Do you agree that Sundays and public holidays should be excluded from the ERP charges for the Central District ERP Pilot Scheme? Do you have any other views on the charging period?*

Response

Given that traffic on Sundays and public holidays is not heavy when compared to weekdays, it sounds reasonable that Sundays and public holidays are to be excluded from the ERP charges. This is in line with the Singapore, London and Gothenburg Schemes and makes sense with the objective to reduce traffic at peak hours. The suggested charging period is set based on the traffic flow in Central and its adjacent areas, and is therefore considered reasonable.

(D) Charging Level

- Q6 *Which charging approach do you prefer for the Central District ERP Pilot Scheme - a unified charge for all vehicles, differential charges based on vehicle sizes (i.e. larger vehicles to be charged more), or differential charges based on a vehicle's carrying capacity (i.e. vehicles with higher carrying capacity to be charged at lower levels)?*

Background materials for Q6 & Q7 (Para 39-41 of executive summary):

The ERP charge must be set at a level that could induce motorists to consider adjusting their travel behaviour. In setting the most appropriate charging level, it is necessary to take into account a host of factors, including motorists' behaviour, traffic flow variation, charging mechanism, vehicle types to be charged or exempted (if any) and public views.

There are three different charging approaches:

- (a) A unified charge for all vehicle types/sizes;
- (b) Differential charges based on vehicle size;
- (c) Differential charges based on vehicles' carrying capacity.

Separately, if a cordon-based charging mechanism is to be used, it is possible to charge motorists according to traffic demands (including travel direction).

Response

Vehicles entering a charging area can be classified into two broad groups.

In the first group, the vehicles need to enter the charging area to effectively provide public services or effectively carry large(r) amount of passengers with a view to reduce road demand. They are emergency vehicles (such as police vehicles, fire engines, ambulances, and public utilities with special permission), and public transportation vehicles (such as franchised buses and public light buses). We suggest that these emergency and public transportation vehicles be exempted from ERP charges. So doing would support optimal use of public transport. We further note that if public transportation is not exempted from ERP charges, the cost will likely be passed through onto passengers, thereby potentially weakening the demand for public transportation and inducing road demand.

As for the second group, it includes all vehicles other than those for emergency purposes and public transportation as mentioned above. When these vehicles enter the area, they will be charged according to their size. This charging principle recognizes the road space occupied by a vehicle using the road which is proportional to its size. It is also noted that similar differential pricing is used in the cross-harbour tunnels in Hong Kong for different vehicle sizes and types.

- Q7 *Do you have any suggestion on the range of ERP charges which you believe could induce motorists to adjust their travel behaviour when (a) ERP charge is levied on a per day basis; or (b) ERP charge is levied on a per pass basis (charging at each and every charging point)?*

Response

To sum up our viewpoints in Q3, Q4, Q5 and Q6, we prefer a cordon-based charging mechanism which allows for a flexible charging structure reflecting vehicle size, time of day, location and traffic direction, subject to a detailed feasibility studies after this initial public engagement exercise. The charging mechanism should deter any repetitive circulation (per day basis) or illegal overstay (per pass basis), and be sufficiently significant to change driving behaviour.

(E) Exemption and Concession\

- Q8 *Do you support providing exemption / concession to vehicles other than emergency vehicles for the Central District ERP Pilot Scheme? If so, what are the type(s) of vehicles and why do you choose them?*

Background materials for Q8 (Para 43 of executive summary):

All vehicles using the road inside a charging area contribute to traffic congestion. It should be noted that the more exemptions of concessions given, the less effective an ERP scheme is. As a result, much higher charges will have to be set for those types of vehicles not exempted / given concession. The Government will

undertake a detailed study on whether and to what type of vehicles should exemptions or concessions be given and develop more concrete options for discussion with the public at the next stage. The study will take into account a number of factors, including the views received from the engagement exercise, consideration of fairness and effectiveness of the scheme.

#### Response

As mentioned in Q6, we suggest emergency vehicles (such as police vehicles, fire engines, ambulances, and public utilities with special permission), and all public transportation vehicles (franchised buses, public light buses, taxis) be exempted from ERP charges.

#### (F) Technology

Q9 *DSRC technology requires the installation of an IVU in each vehicle entering the charging area for ERP payment, while ANPR technology captures the license number plate of a vehicle every time when it enters / leaves / circulates in the charging area. On the whole, would you say that ANPR or DSRC is a more preferable technology for the Central District ERP Pilot Scheme?*

#### Background materials for Q9 (Para 17, 18, 44, 45 of executive summary):

DSRC and ANPR are commonly used technologies for ERP schemes. DSRC stands for "Dedicated Short-range Radio Communication" and ANPR for "Automatic Number Plate Recognition". A key difference between the two is whether a pre-installed in-vehicle unit ("IVU") is required. DSRC requires an IVU, but ANPR not. DSRC is adopted in Singapore, and ANPR in London and Gothenburg.

DSRC technology requires vehicles to pre-install an "IVU" for information exchange with the equipment mounted on ERP gantry / pole using wireless communication, and ERP charges will be immediately deducted from the pre-payment / credit cards inserted in the IVU. (These pre-pay cards can be anonymous, therefore no privacy concerns.) Its simplicity and instantaneous payment feature is particularly suitable for cordon-based charging mechanism. (IVUs can also be used to pay tunnel tolls and parking charges.)

ANPR technology uses cameras to capture the images of the licence number plates of vehicles passing through ERP gantries / poles on which the cameras are amounted. Capturing images of licence number plates may raise concern over privacy, and accuracy of information shown in the captured images needs to be verified by labour-intensive manual checking.

Regardless of which technology type is adopted, installation of roadside hardware for detection of vehicles entering / exiting / being used within the charging area, as well as for enforcement purposes, will be required.

#### Response

We consider that DSRC is a more preferable technology for the Central District ERP Pilot Scheme because the in-vehicle unit installed will allow for flexible ERP charging rates that can best manage traffic. In regards to privacy concerns, tunnel operators in Hong Kong use a form of DSRC to automatically charge motorists using the Autotoll lanes but also use a number plate reading system to identify all cars using these lanes. This is used for identifying those seeking to abuse the Autotoll system.

If there is no system to address abuse of the ERP system then the ERP system will itself be abused. Therefore, combining a DSRC charging system with a vehicle recognition system (similar to an ANPR system) should be given consideration.

#### (G) Other Pertinent Issues – Privacy Concerns

Q10 *Do you have any concern over the protection of privacy in the Central District ERP Pilot Scheme? What are your concern(s) and how do you think it / they could be addressed?*

#### Background materials for Q10 (Para 46, 47 of executive summary):

Inadequate protection of privacy was the primary public concern when the first ERP study was conducted in Hong Kong in 1980s. In the jurisdictions where ERP is implemented now, with the advancement in technology over the years and more established privacy-protection laws, privacy issues have, to a large extent, been addressed.

Nonetheless, in implementing ERP in Hong Kong, there may still be lingering concerns over protection of privacy and concerns over the problems that have not been arisen overseas. To address these issues relating to the Central District ERP Pilot Scheme will be thoroughly examined in consultation with the Office of the Privacy Commissioner for Personal Data.

#### Response

Public concern on privacy is understandable. Even if a DSRC system is adopted, there may be still be a need for some form of number plate recognition system to address any abuse from vehicles not equipped with the proper DSRC equipment entering into the charging zone. Public concerns on privacy can be better addressed with anonymous pre-pay cards as well as clear communications to users on how any data collected will be used or handled. Regardless, robust data privacy standards need to be put in place to ensure public is well protected should an ERP scheme be implemented.

#### (G) Other Pertinent Issues – Effectiveness

Q11 *What indicators do you think we should use to evaluate the effectiveness of the Central District ERP Pilot Scheme?*

Background materials for Q11 (Para 48, 49 of executive summary):

There is a need to establish some quantitative indicators (e.g. reduction of traffic volume within the charging area during the charging period and the corresponding increase of average car speed) for evaluation of the effectiveness of the Central District ERP Pilot Scheme. The evaluation results will provide useful information for the community and the Government to consider whether and how ERP schemes should be put in place to address localised traffic congestion in other parts of Hong Kong.

The effectiveness of an ERP scheme could be weakened when there is a change in travel pattern, or if motorists get used to the ERP charge, or when the effect of the charge has been eroded by inflation or increase in household income. There is therefore a need to have a transparent, objective and regular mechanism to monitor and adjust the ERP charging level.

Response

Given that the objective of an ERP scheme is to provide a disincentive to vehicle users so that they will use their vehicle less in making trips to the charging area in peak hours and switch to public transport, and/or make their trips to the charging area in non-peak hours. As such, measures are needed to assess how successful the scheme is in delivering the objective.

The two measures used in assessing the Singapore, London and Gothenburg schemes, as mentioned in the public engagement document (namely the traffic volume entering the charging area during peak hours and the corresponding average travelling speed) will certainly be useful. THB may wish to observe similar statistics during the hour(s) before and after the daily charging period so as to assess the effectiveness of the charging scheme in shifting road traffic from peak hours to non-peak hours. Further indicators, such as local roadside air quality, can be added as the scheme progresses as and when needed.

Q12 *Do you agree that the charging level should be reviewed regularly and adjusted where necessary in order to maintain the effectiveness of the Central District ERP Pilot Scheme?*

Response

It is important that the ERP charges are regularly reviewed and that this is made clear from the outset since even traffic flow modeling has its limitations and motorist behaviour changes over time. Although it may be unacceptable to change ERP charges too regularly (eg. quarterly), the review itself can be done on a quarterly

basis and also would be useful to track seasonal impact on traffic flows in the ERP area (in fact, this may open the doors to seasonal charging levels as well, eg. summer holidays when school is out). As for the changes in the ERP levels, this can be done on a 'as needed basis' throughout the ERP schemes' duration without any firm commitment to when they can be adjusted, for maximum flexibility

#### (G) Other Pertinent Issues – Complementary Measures

Q13 *Do you have any suggestions on measures which could probably complement the implementation of the Central District ERP Pilot Scheme?*

Background material for Q13 (Para 50 of executive summary):

Overseas experience show that appropriate complementary measures would be instrumental in achieving success for an ERP scheme. The Government will explore appropriate complementary measures\* which could encourage and facilitate drivers or passengers to make better use of public transport, or to travel to the charging area during non-peak hours.

\*In the main body of the consultation document, park-and-ride car parks at or near MTR stations are cited as an example of a complementary measure that allows motorists to park their cars then switch to MTR.)

#### Response

The Chamber offers a number of additional suggestions, which are provided below.

- The ERP scheme should be extended to other areas other than Central and the adjacent areas. For example, those districts failing to meet short-term NO<sub>2</sub> AQO limits (i.e. Kwun Tong, Sham Shui Po, Kwai Chung, Causeway Bay and Mongkok) would be priority targets for such schemes.
- The monies raised by this scheme (or similar schemes in other areas) should be used for the enhancement in transportation infrastructure or public transportation.
- Central and the adjacent areas should be well-served by effectively deployed/coordinated public transport to make the ERP scheme effective. This coordination may also involve a review of tunnels tolls to see how they can serve to direct some of the traffic away from the Cross Harbour Tunnel (to reduce congestion in Central).
- The new Wanchai-Central Bypass can exempt from congestion charges as long as the driver does not exist the new bypass within the congestion area to reduce any potential opposition to the ERP pilot.
- According to overseas experience as mentioned in the public engagement document, it took 4 to 9 years to implement an ERP scheme. Hong Kong will likely need similar long lead time when launching its own scheme given the

complexities involved. Nevertheless, the HKSAR Government should set a realistic target date for the launch of the Central District ERP Pilot Scheme.

- One of the major contributing factors for congestion in Central District is the number of private vehicles waiting/loitering about for their passengers as well as illegal parking. It is recommended that a greater focus be put on this issue by recognising and quantifying this problem and then addressing it through a combination of stricter enforcement and/or higher penalties.
- Consider significantly increasing the levy for new vehicle registrations, similar to the pricing model adopted by Singapore.

We thank you for considering our views.

Yours sincerely,

Philip Leung  
President, Canadian Chamber of Commerce in Hong Kong

cc:

Mr Lawrence Nutting, Chairman, Canadian Chamber of Commerce in Hong Kong

Our Ref:  
Your Ref:

17 March 2016

Commissioner for Transport  
Transport Department  
Room 3926,  
39/F, Immigration Tower  
7 Gloucester Road,  
Wan Chai,  
Hong Kong

[By Post &amp; By Fax: \_\_\_\_\_]

Dear Madam,

**Electronic Road Pricing Pilot Scheme**  
**in Central and its Adjacent Areas**

We are writing in response to the public engagement started in December 2015 for the Electronic Road Pricing (“ERP”) Pilot Scheme in Central and its Adjacent Areas.

We note that Government is considering the ERP Pilot Scheme in Central and its adjacent areas in view of (a) the serious traffic congestion in the areas; (b) the maturity in ERP technology; and (c) the availability of alternative route for through travelers via Central-Wanchai Bypass.

The Kowloon Motor Bus Co. (1933) Ltd. (“KMB”) not only fully supports this initiative but also urges the Government to start planning the ERP Scheme as soon as possible. The success of the scheme hinges on sufficient deterrent of unnecessary or low efficient vehicular trips, public acceptance and the attractiveness of public transport alternatives. To better manage the use of roads so as to maximize the efficiency of the limited road space, KMB shall extend full cooperation and support.

Our views on the basic elements for planning the ERP Pilot Scheme:

**Charging Area & Charging period**

- These should be determined based on the traffic speed of the roads;
- ERP boundary should not create a bottleneck or serious congestion outside the ERP zone and on neighboring network. Any such risks should be mitigated by commensurate public transport priority measures.

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### Charging mechanism, Charging level & Exemption / Concession

- ERP should be cordon-based and charged on a per-pass basis since it is fair and more efficient;
- Charging level should be varied according to the time of the day, travel direction and location; vehicles may also be charged according to the time of staying inside the charging zone if technology permits;
- All franchise buses should have exemption because
  - The focus should be on mobility of people instead of mobility of vehicles
  - Their service level and operation are regulated and controlled by the government, taking the travel demand into consideration
  - They use the road space in the most efficient way
  - The buses are environmentally friendly and can meet the requirements of low emission zone, and
  - Most important of all, public transport should be made attractive enough to provide users a reasonable alternative and offer enough incentive to switch away from other less efficient modes;
- Charging period and level should be reviewed regularly and adjusted according to changes in traffic condition.

### Effectiveness

- Bus speed may be used as an indicator to monitor the effectiveness of the scheme. It is also representative for the large majority of commuters. All the buses in KMB fleet are equipped with GPS and telematics to accurately record the speed;
- Air quality improvement can also be used as an indicator of the Pilot Scheme.

### Complementary measures

- The success of the Pilot Scheme hinges on availability of attractive public transport alternatives:
  - Government should provide supporting infrastructure at suitable locations on neighboring network to facilitate interchange to public transport network, such as park and ride facilities, public transport priority measures;
  - Public transport service level must be constantly monitored to handle the anticipated growing demand for public transport services. KMB will be willing to enhance our service network in the ERP zone if needed to ensure success of the scheme
  - The revenue generated from the ERP charges should be used to subsidize public transport to show that (i) the scheme is not for profit or a new tax; (ii) the fares for public transport can be set at a lower level to reduce public resistance, while enhancing the attractiveness of public transport
- Strict enforcement should be exercised not only for the ERP charge, but also against the illegal parking activities. Enforcement must also be exercised on neighboring road network.



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Our ref.:

17 March 2016

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Thank you for your attention.

Yours faithfully,  
for and on behalf of  
THE KOWLOON MOTOR BUS CO. (1933) LTD

Alok Jain  
Deputy Operations Director



香港智能交通運輸系統協會  
Intelligent Transportation Systems, Hong Kong Limited

**By Fax (Fax No.: \_\_\_\_\_) and Email ( \_\_\_\_\_ )**

Transport Department Headquarters  
Room 3926, 39/F, Immigration Tower  
7 Gloucester Road  
Wan Chai  
Hong Kong

18 March 2016

Dear Sir / Madam

**Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas  
- Public Engagement**

ITS Hong Kong is a non-profit making learned society and its membership comprises organisations and individuals involved in the implementation of Intelligent Transport Systems (ITS). We engage regionally with our peer groups, from the public and private sector to satisfy a range of objectives including the promotion of benefits of ITS and to encourage the exchange of information on applications areas within the field of ITS. For this reason, we offer our comments below in response to the above-mentioned document issued to seek feedback on the potential for Electronic Road Pricing in Hong Kong. Several of our members have been, and are currently involved in, the design and implementation of ERP schemes elsewhere, including delivery of programme management services, the design (and execution) of stakeholder consultation programmes and the evaluation of achieved performance against promised benefits. For the reasons given above, we believe that ITS Hong Kong is eminently well-placed to respond objectively to the consultation.

In general our views are supportive towards ERP. Implemented well, an ERP scheme can deliver many benefits, including reduced congestion for all road users (including public bus users), improved journey time reliability and can assist with demand rebalancing amongst all modes of travel. The effects of ERP can be far-reaching since the impact of behaviour change would extend beyond the charged area on arterial routes.

However, as a policy tool it cannot be used in isolation and other complementary measures would be needed. In particular, the Transport Advisory Committee (TAC) identified 13 recommendations, all of which have been accepted by Government. We propose that Government does not regard the recommendations as separate or independent tools but as components of a larger 'mobility package' which has ERP at its core. In particular, we identify improved parking enforcement as a primary complementary measure and would add improved



signalisation timing, extensive marketing to targeted stakeholder groups, the application of a rational (but limited) range of exemptions and an increase in the allocation of exclusive road space to public bus services, as being other potential measures that could be considered.

Our response is provided under six headings below:

#### 1. Scope of Consultation

Stakeholder engagement programmes conducted globally have found that the level of support for the pricing of road use depends on a range of factors, including the use to which revenues are put. For example, public opinion surveys conducted in New York (scheme planning aborted) and Gothenburg (scheme implemented) considered transport 'packages' that reflected a range of benefits and costs, including the provision for road pricing. To often the debate focuses on the level of charges for road use which invariably results in a negative opinion expressed by stakeholders. For this reason, we would advise that several packages are described and selected variations are also trialled at the same time as any pilot.

For example, Stockholm City hosted a 9-month trial of a transport package. By comparison Transport for London delivered some of the promised benefits early, such as additional bus routed, revised / improved signal timing on adjacent routes so that users could witness such improvements. The Government may wish to associate the opening of the Central-Wanchai Bypass with the simultaneous commencement of the ERP pilot to provide motorists with a viable alternative.

#### 2. Technology Availability

We agree that there are readily available and mature technologies to implement mechanisms for charging and enforcement of an ERP scheme in Hong Kong. For example, the solution may be hybrid of Automatic Number Plate Recognition and Dedicated Short-Range Radio Communication for charging and enforcement. Alternatively, the use of GPS/BeiDou-2<sup>1</sup> or other positioning method could be applicable – noting that both groups were subject to trials for a potential Beijing scheme.

The availability of deliverable, proven technologies mean that the ERP pilot could be carried out as soon as possible. We recommend that any technology adopted for a pilot should provided in a form that is easy for road users to understand to reduce confusion and unintentional misuse that may result in unintended results such as violations caused by improperly installed

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<sup>1</sup> 北斗衛星導航系統



equipment.

Also, we regard that privacy can be protected through a range of technical and organisational solutions. For example, end-to-end encryption to prevent tampering of charge records, Any images of exception events (such as non-payment) can include images of the vehicle without showing the faces of any of the occupants. Also, the charging services provider need not be the same organisation employed for billing. Since the most recent trial in Hong Kong in the late 1990's data protection has evolved considerably and this should be recognised in the requirement specifications that Government develops for the pilot scheme.

### 3. Scope of Pilot

We would recommend 'before' and 'after' study(s) to inform the public of the improvement to road network performance from the implementation of the pilot scheme. A reduction of traffic demand within and in zones that are adjacent to the zone could also improve road safety and reduce harmful emissions – all of which benefit both road users and non-road users, including pedestrians and residents. Therefore, the any Study(s) should cover various aspects include traffic flow (i.e. the quantity of vehicles entering a leaving the priced area), congestion delays time (ration of peak travel time to non-peak travel time), environmental, health, economic and social impacts.

Robust enforcement during the pilot period will be necessary in order to ensure drivers comply with the relevant road traffic regulations including the provisions against illegal loading & unloading, double parking and vehicles attended by professional drivers waiting for their clients. Improved enforcement should be regarded as the development of a deterrent to non-compliant behaviour that impacts road capacity rather than enforcing non-compliant behaviour itself.

### 4. Hypothecation or 'ring-fencing' of revenues

Using of the revenue of ERP from the public, the revenue should either be ploughed back into improvements to the traffic or transport related matters of Hong Kong or alternatively an equal amount to the revenue collected should be seen to be reinvested to benefit all road users, including those that continue to drive.

### 5. Stakeholder Communication

Hong Kong continues to invest in improving the visibility of road network performance and making a subset of data collected available to 3<sup>rd</sup> party application developers or Transport Department apps such as eTransport. We recommend that Government treat the mobility



package as a further opportunity to capture traffic data – to demonstrate improvements in road network performance within and adjacent to the pilot area. This evidence help to reassure the public that benefits are being delivered as promised. Traffic data that is collected should be ready to disseminate back to public through existing channels such as data.gov.hk and all media channel, particularly during the first few months of the pilot. Of course real-time traffic information should also be made available to all drivers to enable each to make an informed decision on changing the mode of travel, traveling during a different time of the day, varying the route or other feasible behaviour changes.

#### 6. Policy Scalability

Finally, we recommend that the ERP scheme should be sustainable and scalable so that succeeding phases of the ERP, as part of the mobility package, may be implemented smoothly and with minimal risk. This should also apply to the charges – simply setting charges without having a mechanism to vary the charges over time to maintain reduced levels of congestion would erode the impact of changes on behaviour change. Although not perfect, the method used by Singapore is based on varying charges monthly to maintain average traffic speeds. By comparison the Mayor of London employs mini-consultations to vary changes, add new discounts or new emission-related exemption (such as low emission vehicles).

As a baseline, we recommend that any charging mechanism employed should reflect different congestion levels or time periods.

We trust that our comments are helpful to help shape an acceptable, sustainable, efficient mobility package that includes pricing alongside complementary transport measures. Please do not hesitate to contact me to discuss any of the points raised in more detail and if requested, we would welcome the opportunity to meet to discuss further.

**Yours faithfully**

**Ir. Charles So**  
**President**  
**Intelligent Transportation Systems, Hong Kong**



Transport Department  
Room 3926, 39/F, Immigration Tower,  
7 Gloucester Road, Wan Chai, Hong Kong.

Date: 18 March, 2016  
(By Fax and Email)  
(Fax No. 2802 2673)

Dear Sir or Madam,

**Re: Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas,**  
**Public Engagement Document**

In the last decade, traffic congestion of Hong Kong's city center has worsened to detrimental levels. The negative impacts of this have been notorious, especially loss in productive hours to local businesses, a deteriorating walking environment, road-side air pollution, and an unfriendly city image for tourists. In this respect, we are in-principle support for implementing the ERP pilot scheme as soon as possible, as it provides an innovative, sustainable and effective means to reduce the congestion in the Central Business District, build on our world-class public transport system, create opportunities for environmental improvement and a more pedestrian-friendly city center.

The benefits of ERP is well-recognized and case studies from Singapore, London and other global cities have shown that it can effectively and significantly reduce traffic congestion, and in parallel, enable complementary measures to boost local businesses, reduce environmental pollution, and convert unneeded road space for public spaces and walking environment. Therefore, emphasis should be put on pedestrian planning as an important complementary measure in the ERP pilot scheme; to create a walkable city centre and raise the world-class image of the Central Business District.

Since 2000, the Hong Kong Institute of Planners has been taking forward the implementation for a pedestrian and tram precinct at Des Voeux Road Central, from Morrison Street to Pedder Street. This scheme should be encompassed in the ERP Pilot Scheme area, and considered as a complementary measure. DVRC is pivotal location of pedestrian connection between the inner city area to the waterfront (in north-south direction) and also Sheung Wan, Central and other districts (in east-west direction). It also has advantage of having MTR exits throughout the length of the street. It is very accessible to public transport, including the MTR, tramline,

bus network, mini-bus and taxi. Our study have carried out technical assessments that show the reduction in vehicle numbers would allow road space to be converted for pedestrian facilities, which would bring about improvements to the city environment and air quality.

In measuring the effectiveness of the ERP Pilot Scheme, besides air quality and traffic aspects, the changes in pedestrian flow and numbers should also be included to look at the impact on the pedestrian environment.

We fully support the early implementation of the Electronic Road Pricing scheme in the Central District, and to include the entire length of DVRC as an important focus area of the early phases of this scheme; which we believe would bring about the greatest public benefits.

Yours faithfully,

Dr. Eunice Mak  
HKIP President



P00021

# 香港公路學會

## Hong Kong Institution of Highways and Transportation



Your reference:  
Our reference:

Transport Department  
Room 3926, 39/F, Immigration Tower  
7 Gloucester Road,  
Wan Chai,  
Hong Kong  
[By Fax (2802 2673) & By Post]

18 March 2016

For the attention of Mrs. YEUNG HO Poi Yan, Ingrid, JP, Commissioner for Transport

Dear Madam,

### **ERP Pilot Scheme in Central and Its Adjacent Areas**

With the ever increasing of vehicles and traffic congestions in developed districts, and further infrastructure development in these districts are no longer feasible, Electronic Road Pricing (ERP) may be one of the few options remain to alleviate traffic congestions. Hong Kong Institution of Highways and Transportation generally supports the pilot scheme on Electronic Road Pricing. However, the Institution would like to raise various issues for Transport Department's further considerations.

#### **I. Selection of Location for the Pilot Scheme**

Not only the Central in Hong Kong Island as the central business district (CBD) is one of the busiest districts in Hong Kong, it is also the bottle neck for commuters traveling from east to west, or vice versa on the northern shore of the Island. These commuters have no real alternative; and even with ERP, they will still have to go through the CBD. The proposed ERP may not alleviate traffic congestion but unfairly penalized commuters who are only passing through the district. While the Central – Wan Chai Bypass can provide an alternative route for the East – West through traffic, there are still some through traffic generated by the adjacent Sheung Wan, Mid-level and Admiralty areas. The Institution suggests the government to select the location of the pilot scheme where apparent alternative traffic routes are available. This allows the government to understand the effects and benefits of ERP before a large scale roll out of the new scheme.

#### **II. Consideration of Alternative Control Measures**

Before the government prepares a large scale implementation of ERP in Hong Kong, the government should consider other means to increase road usage efficiency. The Institution would like to suggest a few measures for the government to consider:-

##### **a) Stricter Illegal Parking and loading/unloading Control**

In many countries, illegal parking violations are handled with stricter measures to discourage further offenses. Illegal parked cars would be tolled away, and their owners are heavily penalized. Furthermore, if the loading and unloading along the section of Queen's Road Central (QRC) between Garden Road and Bonham Strand can be more stringently controlled if not totally banned, the traffic congestion along QRC can be significantly improved.

# 香港公路學會

## Hong Kong Institution of Highways and Transportation



P. 2

Your reference:

Our reference:

**b) Improve Availability of Parking Spaces**

We understand control the supply of parking spaces in a congested area is one of the Traffic Demand Management measures, however, a balance shall be struck, and sufficient provision shall be given to cater for those essential demands.

**c) Control of Public Transportations**

Excessive public transportations can put additional loading to an already congested traffic. The government shall further study the number of empty buses, taxis, etc., and their optimal distribution within each district.

### III. Consideration of Social Issues

While ERP may be successful in regions such as Singapore and London, the government should also consider the side effects that ERP brings to our society.

**a) Effects on Local Residents**

For the residents that having been living in the proposed ERP implementation districts, they could feel that they are being unfairly treated as they were the ones who suffer the most from the congestion but will also have to pay the most without any alternative, aside from moving out of the district.

**b) Increase Public Transportation Fare**

With the introduction of ERP, fares of public transportation systems may also increase, if the charge is transferred to the passengers. However, for commuters who have always been using public transportation and were never the causation of congested traffic may now have to pay an additional price. The additional income from the ERP maybe used to reduce fares and encourage more commuters to take public transportations. If the scheme is successful, the journey time and speed of buses will be improved, hence reducing the buses operation cost. We suggest that the charge shall not be passed onto the passengers.

**c) Region of the Riches**

ERP may give an impression to the public that regions with ERP are tailored for the riches. Every citizen of Hong Kong, in particular those road users who have paid vehicle license fee, shall have the right to use the roads and infrastructures of Hong Kong, and such impression should be considered in deciding ERP pricing. Fairness is vital to the success of gaining public support.

**d) Privacy**

The government should also address privacy concern, as many commuters would be concerned about their private information, such as image of people inside the vehicles taken, information on the time and location of drivers being recorded and misused. Such problem should be trivial with today's technology.

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## Hong Kong Institution of Highways and Transportation



P. 3

Your reference:

Our reference:

Regarding the questions raised in the public engagement document, the Institution has the following comments:-

**a) Charging Area Q1 & Q2**

The exact boundary shall be kept to minimum as far as practicable in order to achieve the objectives in reducing traffic volume in busy areas while minimize the impact to local resident and essential road users.

**b) Charging Mechanism Q3**

The scheme shall be about to achieve the objectives while maintain its flexibility. Cordon-based one may be better. The area-based one charges vehicles on daily basis and also unlimited trips in and out of the area, and this may generate some "feeder services", which may defeat the purpose of the scheme.

**c) Charging Period Q4 & Q5**

The charge shall cover all congested period during week day, while charge for week end and public holiday can be reduced or waived. When the charge has effectively reduced congestion, then it should be stopped. Excessive charge shall be avoided.

**d) Charging Level Q6 & Q7**

The charges shall be different for different types of vehicles and shall vary throughout the day. It must be seen as a fair charging system. However, the Administration should consider whether the drivers may purposely slow down or speed up the car at the moment when the charge is about the change.

**e) Exemption / Concession Q8**

To be fair, all vehicles shall be charged. However, the impact to those essential trips must be addressed, e.g deliverable trucks, taxi trips for patient, elderly etc.

**f) Technology Q9**

In deciding which technology shall be used, it depends on the charging mechanism, whether the scheme will be extended to other districts if successful in Central, the likelihood of using the In-Vehicle Unit (IVU) for toll and parking charge collection. The feasibility of using Automatic Number Plate Recognition (ANPR) for the trial and replaced by the Dedicated Short-Range Communications (DSRC), if the scheme becomes permanent, shall be studied.

**g) Effectiveness Q11 & Q12**

Some measurable indicators shall be used, such as traffic volume, journey time and speed. The impact to the local business shall also be monitored and assessed. The charging level shall be reviewed, and the corresponding changes in the indicators.

.../Cont'd

香港公路學會

Hong Kong Institution of Highways and  
Transportation



P. 4

Your reference:

Our reference:

**h) Complementary Measures Q13**

The key objective of the scheme is to reduce congestion in Central by reducing vehicular traffic. Central has several hundred thousands of commuters to work and visitors every day, many of them are essential trips. Convenience and attractive alternative modes must be provided, measures to encourage transfer from private cars and taxis trips to buses and MTR are essential to the successful of the scheme. In addition, traffic management measures shall be formulated at the boundary of the scheme, in order to prevent congestion at the entry and exit points.

Provision of Park and Ride (P&R) at the fringe of the area shall be assessed carefully, to avoid transferring the congestion problem from Central to other area. Bear in mind the objectives are to reduce vehicular traffic, and promote the use of public transport, not to transfer the traffic from Central to others, nor from private cars to taxis.

We are encouraged that the government is considering to test new measures in improving the traffic congestion of Hong Kong. And while we support the pilot scheme, the Institution would like the government to review our comments carefully and take appropriate measures.

Yours faithfully,

Ir CHENG Ting Ning, Albert, JP  
President of Hong Kong Institution of Highways and Transportation

## Opinion to be submitted to Transport Department in response to the Central District ERP Pilot Scheme

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17 March 2016

Dear Sir/Madam,

I am writing to voice my opinion against the ERP Pilot Scheme for Central District and surrounding areas.

As a member of Hong Kong Institution of Engineers in civil and logistics & transport discipline, I do not see the need for the introduction of ERP in Hong Kong. I have the following reasons:

- 1) As we know, the Central-Wanchai bypass is going to be finished after 2017. It is planned with the aim to ease the traffic in between these areas. We should wait and observe the effectiveness of the Central-Wanchai bypass first, then evaluate if we really need ERP or not.
- 2) As discussed in "Report on Study of Road Traffic Congestion in Hong Kong" conducted by Transport Advisory Committee in December 2014, one of the root causes of slow traffic in Hong Kong is the management and enforcement issues of congestion-related illegal acts, such as "illegal parking, double parking, loading/unloading activities in restricted zones, prolonged loading/unloading in non-restricted zones or vehicles staying inside the yellow-box road junctions" etc. (p.32, "Report on Study of Road Traffic Congestion in Hong Kong") Therefore, I think the ERP will not help with the traffic jam problems in Hong Kong. Rather, a more stringent law enforcement on the illegal parking activities could better ease the problems.
- 3) Another major reason of traffic jam in Hong Kong is the bottle-necks around both ends of the Cross-Harbour Tunnel, mainly due to its pricing which is most preferred by general public and commercial drivers. Whilst the government will resume the ownership of the East Harbour Crossing when its franchise expires this coming August, and that of the Western Harbour Crossing will follow-suit in 2023, the government will have the room to review the strategic planning of the traffic management with the three cross-harbour tunnels and adjust the pricing, which might then optimize the traffic distribution across the three tunnels. This will substantially relieve the traffic problems in both Kowloon side and Hong Kong side.

As ERP requires additional infrastructure (both hardware and software-wise) and takes considerable costs and efforts both on the government side and the road users' side, the government should use other ways to tackle the root cause first. If the traffic problems persist after all other more cost effective measures being taken, only then the government should review ERP again as a last resort.

Thank you.

Cheung Fú Chi, Patrick  
BEng, MHKIE, MICE, CEng, RPE

## Opinion to be submitted to Transport Department in response to the Central District ERP Pilot Scheme

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17 March 2016

Dear Sir/Madam,

With regard to your public consultation about the introduction of Electronic Road Pricing in Hong Kong, with the pilot scheme to focus on Central and other adjacent to areas, I would like to express my disagreement with this proposal from my professional background in logistics and transport industry.

### 1) **Illegal parking and lack of law enforcement**

On one hand, the bad traffic jam in Central area, such as Chater Road and Queen's Road Central, as observed and much discussed by general public, is largely due to many illegal parking activities, like private cars waiting on the roadside, double parking, cars driving around to find parking or just to "kill time" going around while waiting for their bosses or clients, or time consuming loading of commercial vehicles. Those phenomena could be the results of insufficient parking facilities. As a Hong Kong citizen, I certainly doubt on why there is little police action or other law enforcement such as giving them fine tickets, or at least to have traffic police to give verbal warnings to clear those cars. This I am sure will help solve at least part of the traffic jam problems in the area.

### 2) **Central-Wanchai Bypass**

Besides, the Central-Wanchai Bypass, a project which is likely to bring big changes to the traffic in the surrounding areas, is aimed to help divert drivers to go directly from Sheung Wan to Fortress Hill and vice versa without having to get stuck in the busy area of Central/Admiralty/Wanchai/Causeway Bay. Even though it will not be ready and open as originally planned in end of 2017, its opening for use in near future will help ease the pressure of road traffic in Central/Admiralty and surrounding area. I believe the government should wait and see how the Central-Wanchai Bypass works to ease the traffic problem, before spending more public money on setting up ERP.

### 3) **Cross-harbour tunnel prices to adjust**

Lastly, it is widely understood that much of the cause of the traffic jam in Hong Kong is due to the heavy traffic focusing on and around of the Cross Harbour Tunnel with its two ends in Hunghom and Wanchai/Causeway Bay – a big reason of this is not just because of the tunnel's central location but rather because this tunnel is the cheapest among all three cross-harbour tunnels. Since the operation franchise of Eastern Harbour Tunnel will end soon (August 2016) and the government can take over the tunnel, the government should lower the fees of the Eastern Harbour Tunnel to attract more road-users to cross the harbour from eastern Kowloon and Hong Kong Island – especially the prices for commercial vehicles including taxi, minibuses, public buses and trucks.

## Opinion to be submitted to Transport Department in response to the Central District ERP Pilot Scheme

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In addition, when the Western Harbour Tunnel Company's operational franchise expires in 2023, we expect the government to not only take back its ownership but also SUBSTANTIALLY lower the fees to more acceptable price levels to entice drivers crossing the harbour between West Kowloon and West District areas.

As a professional specialising in logistics and transport discipline, I hope the above opinions can convince the related government officials and all other concerned parties that the ERP is not necessary, because there are other more viable solutions for managing our traffic congestion before considering ERP. Thank you for your attention.

Chan Wing Kam  
CMILT

《中區電子道路收費免等計劃(計劃)》

本人反對計劃，原因如下：

- (一) 計劃全面改變路面生態，並影響大量持份者的生活和生計，而有關計劃的措施可能只會讓車量提速約20%。因此，計劃成效存疑；
- (二) 基於地理上的局限，歷史上的發展和商業經濟的流動，中區的擁塞似是難以改變的現實；
- (三) 集體運輸系統已沒有空間吸納因計劃而新增的客量；及
- (四) 區外路面已沒有空間吸納因計劃而新增的車流。

中區的擁塞只能舒緩，不能解決。本人建議當局可考慮

下列措施，以改善交通情況：—

- (一) 引入先進交通燈系統(例如：以流量計算為本的燈號)；
- (二) 調派人員指揮及疏導交通，並加強核控違泊車輛(特別是所謂“老鬧車”的士)；及
- (三) 重整巴士路線，分流“之隆”並打通“繞道”

李君傑

一個在港島區生活了45年的居民  
17.3.2016





立法會 謝偉銓議員辦事處  
OFFICE OF THE HON. TONY TSE

## 2016 年《中區電子道路收費先導計劃》 意見書

立法會議員謝偉銓  
(建築、測量及都市規劃)  
2016 年 3 月 18 日



## 立法會議員謝偉銓

### 對 2016 年《中區電子道路收費先導計劃》的意見

#### 引言

為紓緩交通道路擠塞情況，政府早前提出《中區電子道路收費先導計劃》公眾諮詢文件徵詢市民意見。本人的議員辦事處亦於今年 3 月上旬，與建築、測量、園境及都市規劃專業界別舉辦「中區電子道路收費先導計劃」研討會，就諮詢文件相互表達意見。

#### 建議

道路暢通，最終受益的是道路使用者，這亦包括了行人。雖然，本人與出席研討會的業界朋友原則上不反對實施電子道路收費，然而在決定實施時的規劃設計、需要的設施和實施的空間、地點等必須事前取得社會各界大多數的認同。

就諮詢文件，本人有以下一些初步意見：

#### I. 選取實施先導計劃的地區

政府建議在中環及其鄰近地區推行電子道路收費先導計劃，原因是該區乃香港的商業中心區，交通擠塞。綜合諮詢文件中，海外實施電子道路收費的例子，不少亦選取商業中心區進行。

而香港除了中環，還有不少商業區，如灣仔、銅鑼灣、旺角等，又或觀塘這類工業區，同樣面對道路常年擠塞的情況，因此如要實施「電子道路收費計劃」，其覆蓋的地區應有客觀標準，如行車速度每小時低於一定里數等，而非只針對中環一帶。



立法會 謝偉銓議員辦事處  
OFFICE OF THE HON. TONY TSE

據資料顯示，香港的私家車數目在過去十年每年平均增幅約4%，而2015年增幅更達5.4%，但全港道路網絡過去十年的擴展速度，只有每年約0.8%。因此，「電子道路收費計劃」在中環地區實施後，會否把中區疏導了的車輛轉到鄰近地區，造成有關地區更為擠塞？

另一方面，政府將以東九龍作為發展「聰明城市」的試點，而智慧城市可由交通做起，若可同時引進這個電子道路收費計劃，配合智慧城市的科技發展，並作為「先導計劃」，「相輔相成」，亦可加快實現「智慧城市」。

## II. 收費計算方法及水平

### 1. 以行車速度、佔用道路路面時間作基準

收費方法方面，建議以行車速度作考慮，做法是，收費以路面行車速度計算，若車流量少、行車速度愈快，收費將愈低。此收費方法更符合用者自付的公平原則，亦可鼓勵駕駛者善用路面。然而我們亦要考慮以下因素：首先，行車速度受路面面積、車流量及行人流量而影響。若行車路面擴闊了，行人路面相對會收窄，有機會加劇人車爭路的情況，阻礙行車流量及速度。又如該區路面若太多過路設施，如斑馬線等，亦會減慢該區的行車速度，

另一方面，收費亦應以車輛佔用路面的時間作計算基準，這時間包括了車輛逗留路面的時間及停留時段。佔用路面時間愈長、及於繁忙時段(即行車速度緩慢時段)使用該區路面，收費相應較高。若車輛駛入收費區後停泊停車場內，則不納入收費計算範圍。政府亦應把握這機會善用及結合現代科技，以現今的科技水平去拓展電子道路收費發展，例如用於計算車輛使用停車場的前後、佔用路面的時間。



### III. 科技

香港大廈林立，建議採用自動化的短距離微波通訊技術，配合自動拍攝違例車輛。車輛可以預繳卡繳費方式付款，減少涉及私隱的爭議。

### 總結

自 1980 年代至今，政府已 3 次就電子道路收費作出研究，交通擠塞不但影響城市的宜居性，亦影響經濟活動，我們必須正視、解決。鑑於是否採用電子道路收費辦法，由研究至興建相關設施及系統需時，政府有必要加快作出決定。同時，當局亦應多管齊下改善交通擠塞，包括做好路面管制，處理非法佔用路面的車輛，加強執法，使路面暢通，這對改善空氣質素亦有幫助，最終駕駛者和行人也能受惠。

香港電燈有限公司  
The Hongkong Electric Co., Ltd.



Our Ref.:

17<sup>th</sup> March 2016

Transport Department  
Room 3926,  
39/F, Immigration Tower,  
7 Gloucester Road,  
Wan Chai,  
Hong Kong.

Dear Sir,

Response to Public Engagement Document on  
Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas

We attach herewith the response of The Hongkong Electric Co., Ltd. (HK Electric) to your public engagement document on the “Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas” for your kind consideration.

Please note that HK Electric is responsible for providing a reliable electricity supply to Hong Kong Island and Lamma Island. In order to enable our employees to carry out the daily operational activities in an efficient way and attend any emergency situations promptly, we maintain a vehicle fleet and smooth road traffic is important to us so that our employees can arrive site within a reasonable time. Therefore, HK Electric fully supports the Government to explore ways to tackle the locations with severe traffic congestion.

We would like to emphasize that if the above-mentioned pilot scheme is to be implemented, appropriate exemption on the ERP charging should be granted to the operational vehicles of public utilities (e.g. electricity, gas and telecommunication, etc.) as there is a need for these utilities to provide services for the customers and society under both normal and emergency situations. In addition, electric vehicles which have zero emissions should be exempted or provided with concession.

Yours faithfully,

Andy Wong  
GROUP TRANSPORT MANAGER

Encl.

/aw

RESPONSE TO PUBLIC ENGAGEMENT DOCUMENT ON ELECTRONIC ROAD PRICING PILOT SCHEME IN CENTRAL AND ITS ADJACENT AREAS

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The Hongkong Electric Co., Ltd. (HK Electric) is responsible for providing a reliable electricity supply to Hong Kong Island and Lamma Island. In order to enable our employees to carry out the daily operational activities in an efficient way and attend any emergency situations promptly, we maintain a vehicle fleet and smooth road traffic is important to us so that our employees can arrive site within a reasonable time. Hence, HK Electric fully supports the Government to explore ways to tackle the locations with severe traffic congestion.

Regarding the Government's "Public Engagement Document on Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas", we would like to express our views and comments as shown below.

**Charging area**

***Q1 Do you have any views on how the boundary of the Central District ERP Pilot Scheme should be drawn up, and what are your reasons?***

Views and Comments to Q1:

- a. The proposed charging area for this ERP Pilot Scheme should be confined to where severe traffic congestion occurs with very limited parking spaces but public transportation is well served.
- b. Draw up of the boundary of the ERP Pilot Scheme should not shift the traffic congestion to the adjacent areas.
- c. Alternative routes should be available for those vehicles going to other districts without the need to drive through the ERP area.
- d. Availability of other convenient transport modes to access to the ERP area.
- e. Availability of parking facilities outside and in close proximity to the pilot scheme charging area if park-and-walk and/or park-and-ride are complementary measures to be considered in conjunction with the pilot scheme.
- f. The arrangement of the existing Part-time and Full-time Pedestrian Streets, and Traffic Calming Street under the prevailing Pedestrian Schemes for Central should be duly considered and adjusted if necessary.

***Q2 Do you think some neighbouring areas of Central, say some parts of Admiralty or Sheung Wan, should be covered in the Central District ERP Pilot Scheme? If so, which area(s)?***

Views and Comments to Q2:

- a. Please refer to our views shown above on how the boundary of the Central District ERP Pilot Scheme should be drawn up. In addition, the extension of the ERP scheme

RESPONSE TO PUBLIC ENGAGEMENT DOCUMENT ON ELECTRONIC ROAD PRICING PILOT SCHEME IN CENTRAL AND ITS ADJACENT AREAS

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to other areas should be subject to the evaluation of the effectiveness of the Pilot Scheme.

**Charging mechanism**

***Q3 Do you prefer an area-based or cordon-based charging mechanism for the Central District ERP Pilot Scheme? Why?***

Views and Comments to Q3:

- a. Cordon-based charging mechanism is more preferable such that the vehicle would be charged on as-needed basis, and considering its inherent flexibility for adapting future changing situation.

**Charging period**

***Q4 Do you agree that ERP charges for the Central District ERP Pilot Scheme should be imposed throughout the hours in a day when the traffic flow is high in the charging area?***

Views and Comments to Q4:

- a. The ERP charges for the Central District ERP Pilot Scheme should only be imposed throughout the office hours in a day (e.g. 08:00 to 19:00 hours) when the traffic flow is high in the charging area.

***Q5 Do you agree that Sundays and public holidays should be excluded from the ERP charges for the Central District ERP Pilot Scheme? Do you have any other views on the charging period?***

Views and Comments to Q5:

- a. It may not be necessary to extend the charging period to cover Sundays and public holidays if the traffic congestion in these days is not severe.
- b. The charging period can be adjusted to cope with the charging situation subject to regular review.

**Charging level**

***Q6 Which charging approach do you prefer for the Central District ERP Pilot Scheme – a unified charge for all vehicles, differential charges based on vehicle sizes (i.e. larger vehicles to be charged more), or differential charges based on a vehicle's***

RESPONSE TO PUBLIC ENGAGEMENT DOCUMENT ON ELECTRONIC ROAD  
PRICING PILOT SCHEME IN CENTRAL AND ITS ADJACENT AREAS

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*carrying capacity (i.e. vehicles with higher carrying capacities to be charged at lower levels)?*

Views and Comments to Q6:

- a. According to Cap 374A Road Traffic (Construction and Maintenance of Vehicles) Regulations, the maximum overall length of each vehicle type is defined, e.g. 6.3m for private car and 12m for special purpose vehicle. That means that a special purpose vehicle may occupy the road space about twice as a private car. Therefore, different charges based on vehicle sizes are preferred.
- b. Furthermore, the charge should also be based on vehicle emission standard so as to address road side emission issue.

**Q7** *Do you have any suggestion on the range of ERP charge which you believe could induce motorists to adjust their travel behaviour when (a) ERP charge is levied on a per day basis; or (b) ERP charge is levied on a per pass basis (charging at each and every charging point)?*

Views and Comments to Q7:

- a. For testing the effectiveness of different possibilities, differential charges may be considered. However, the rationale of setting the charging levels for different vehicles shall be clearly explained to the stakeholders and the general public.
- b. In general, the ERP charge for entering the charging area shall be set higher than the cost (including time cost) to the vehicle drivers for using other alternative transportation means, e.g. park-and-ride, park-and-walk and other alternative but with longer route.
- c. The charging level and design shall be adjusted to cope with the changing situation subject to regular review.
- d. Some form of progressive increasing charging should be considered for vehicles repetitively entering / leaving the ERP zone.
- e. All revenue income generated from ERP charging shall be invested back to improve the road environment and its future development.

**Exemption / Concession**

**Q8** *Do you support providing exemption / concession to vehicles other than emergency vehicles for the Central District ERP Pilot Scheme? If so, what are the type(s) of vehicles and why do you choose them?*

Views and Comments to Q8:



RESPONSE TO PUBLIC ENGAGEMENT DOCUMENT ON ELECTRONIC ROAD PRICING PILOT SCHEME IN CENTRAL AND ITS ADJACENT AREAS

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- a. It is necessary to provide exemption / concession to some types of vehicles other than emergency vehicles for the Central District ERP Pilot Scheme. These vehicles shall include:-
- Operational vehicles of public utilities (e.g. electricity, gas and telecommunication, etc.) should be exempted as there is a need for these utilities to provide services for the customers and society under both normal and emergency situations.
  - Public land transport (e.g. franchised buses, public mini buses, taxis and trams etc.) should be exempted. If not, the cost of charges will be transferred to the users of public transport via the fares paid.
  - Concession or controlled exemption shall be considered for vehicles of the disabled and residents living within the charging areas.
  - Electric vehicles which have zero emissions should be exempted or provided with concession.

**Technology**

***Q9 DSRC technology requires the installation of an IVU in each vehicle entering the charging area for ERP payment, while ANPR technology captures the licence number plate of a vehicle every time when it enters / leaves / circulates in the charging area. On the whole, would you say that ANPR or DSRC is a more preferable technology for the Central District Pilot Scheme?***

Views and Comments to Q9:

- a. The technology options should not be limited to ANPR and DSRC. As a matter of fact, Singapore has been testing the use of Global Navigation Satellite System (GNSS) as their next generation ERP technology (ERP II) under their Smart Mobility 2030 strategy. The GNSS-based ERP system will overcome the inflexibility of having physical gantries and make distance-based congestion charging possible.
- b. From flexibility and scalability for future smart applications (e.g. auto-payment of tunnel toll, parking charges, etc.), ANPR is more preferable as compared with DSRC.
- c. The following factors should be duly considered when selecting the technology:-
- One-off application of the technology solely for the pilot scheme or for the longer term transport management (smart mobility) strategy. There is a chance that the pilot scheme may not be effective in resolving the congestion problem and all the invested facilities may not have alternative use.
  - Life-cycle cost covering the upfront capital cost and the subsequent operation and maintenance costs.
  - Maintainability (e.g. technical supports from the vendor, technological obsolesce etc.).
  - Compatibility and scalability for other smart applications.

RESPONSE TO PUBLIC ENGAGEMENT DOCUMENT ON ELECTRONIC ROAD  
PRICING PILOT SCHEME IN CENTRAL AND ITS ADJACENT AREAS

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- Considering that the cross boundary vehicles will be increased after commissioning of the HZM Bridge, the ANPR technology could address the compatibility problem easily by taking a photo of their car plate numbers and the vehicles could settle the charges when leaving Hong Kong's boundary. It may be difficult to resolve it if DSRC technology is adopted as the compatibility issue will involve 2 or 3 jurisdictions.

**Privacy concern**

***Q10 Do you have any concern over the protection of privacy in the Central District ERP Pilot Scheme? What are your concern(s) and how do you think it / they could be addressed?***

Views and Comments to Q10:

- a. Privacy is an unavoidable concern and should be properly addressed. Similar to other electronic/internet/telecom applications (e.g. mobile phone, Octopus cards, Autotoll, CCTVs around the city), the personal data (e.g. pattern of entering / leaving the ERP area) of the ERP users are bound to be tracked no matter which technology is used. Hence, it should rather be the proper use and archive of the collected data from ERP system under relevant legislations.

**Effectiveness**

***Q11 What indicators do you think we should use to evaluate the effectiveness of the Central District ERP Pilot Scheme?***

Views and Comments to Q11:

- a. The effectiveness of the Central District ERP Pilot Scheme may be evaluated based on a basket of indicators such as:-
  - Volume of traffic entering the ERP charging area and using nearby alternative route
  - Vehicle travelling speed within and adjacent to the ERP charging area
  - Number of complaints
  - Opinion survey results
  - Improvement of local air quality in the tested area

***Q12 Do you agree that the charging level should be reviewed regularly and adjusted where necessary in order to maintain the effectiveness of the Central District ERP Pilot Scheme?***

Views and Comments to Q12:

RESPONSE TO PUBLIC ENGAGEMENT DOCUMENT ON ELECTRONIC ROAD PRICING PILOT SCHEME IN CENTRAL AND ITS ADJACENT AREAS

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- a. We agree that the charging level should be reviewed regularly and a mechanism be devised for adjusting the ERP charging levels in order to maintain the effectiveness of the Central District ERP Pilot Scheme.

**Complementary measures**

***Q13 Do you have any suggestions on the measures which could complement the implementation of the Central District ERP Pilot Scheme?***

Views and Comments to Q13:

- a. Complementary measures should be so designed in a holistic approach under the overall transport (or smart mobility) strategy.
- b. It is worth considering to provide sufficient parking facilities outside and in close proximity of the ERP charging area and/or nearby MTR stations to facilitate park-and-walk and/or park-and-ride travelling mode.
- c. Electric vehicle battery chargers may also be provided at the aforementioned car parks to further promote green mobility.
- d. As a long term policy, all charges / levies collected should be wholly invested in improving the entire green transportation infrastructure and demonstrated to the public as tax neutral.
- e. Provide tax concession for environmentally friendly vehicles to improve road side air quality, especially due to traffic congestion.

In summary, HK Electric fully supports the Government to explore ways to tackle the locations with severe traffic congestion. If the “Electronic Road Pricing Pilot Scheme in Central and Its Adjacent Areas” is to be implemented, appropriate exemption on the ERP charging should be granted to the operational vehicles of public utilities (e.g. electricity, gas and telecommunication, etc.) as there is a need for these utilities to provide services for the customers and society under both normal and emergency situations. Also, electric vehicles which have zero emissions should be exempted or provided with concession.



18<sup>th</sup> March 2016

Transport Department  
Room 3926, 39/F, Immigration Tower  
7 Gloucester Road  
Wan Chai, Hong Kong

Dear Sirs

### **Public Consultation on Electronic Road Pricing Pilot Scheme**

We refer to the public consultation by the Transport and Housing Bureau and the Transport Department on an Electronic Road Pricing (ERP) Pilot Scheme in Central and adjacent areas. As a significant landlord with a significant number of office and retail tenants in Central, Hongkong Land would like to offer our views.

Since the 1980's, the Government has conducted three studies on ERP in Hong Kong. The first ERP pilot study took place between July 1983 and March 1985. The second ERP feasibility study was undertaken in March 1997. The third ERP study, namely the "Congestion Charging Transport Model - Feasibility Study", was commissioned in February 2006.

Although these studies determined that ERP was technically feasible, each study came up with the same recommendation that additional restraint measures, like EPR, were not warranted on traffic management grounds. Consequently, it was never implemented. Since these studies, there has been limited growth in the number of vehicles. In fact, the average annual growth has been below the 3% per annum mark as stipulated in the 1997 ERP Study, within which the traffic conditions are believed not to deteriorate. At the same time, there have been a number of new developments. Traffic congestion in the central business district will certainly be alleviated upon the completion of the infrastructure projects currently under construction, namely the new railway lines (the South Island Line and the Shatin - Central Link) and the Central - Wan Chai Bypass.

As importantly, there continues to be a number of other, simpler traffic management measures which can be implemented to alleviate traffic congestion in Central. Hongkong Land believe that it would be much more effective to implement these other traffic management measures, before implementing ERP. Some of the feasible short and medium-term traffic measures include:

- (1) Restoring the deterrent effect of fixed penalty tickets for congestion-related offences, (such as illegal on-street parking as well as loading and unloading activities), by raising penalty charges;
- (2) Strengthening enforcement actions through the use of additional police resources to ensure congestion-related regulations are consistently enforced;

Page 1 of 2



- (3) Reviewing franchised bus operations, with the objective of optimizing bus routes and bus stops, to reduce duplication and redundancy thereby improving the service and traffic speed of buses in Central;
- (4) Imposing restrictions on stopping and making deliveries by goods vehicles during peak hours;
- (5) Using information technology to disseminate real-time traffic information on both congestion and accidents to road users; and
- (6) Providing more "park and ride" facilities to enable motorists to drop off their cars at transport hubs near MTR stations and travel to Central by MTR.

Hongkong Land believe that these traffic measures would be both viable and effective in improving traffic congestion in Central and can be more easily put into place. These measures should be fully deployed before ERP is implemented as the means of last resort.

Further, with the opening of the new railway lines and the Central – Wan Chai Bypass in the coming years, the traffic speeds and travelling time in Central will definitely be enhanced. At that time, it will be again important to consider the traffic conditions and accessibility in Central. As such, there is no imminent need to implement ERP in Central.

Yours faithfully,

Y K Pang  
Chief Executive



## Opinion to be submitted to Transport Department in response to the Central District ERP Pilot Scheme

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17 March 2016

I am a professional in logistics and transport field. I am writing herein to express my view that the government should not introduce ERP in Hong Kong at this stage.

First of all, ERP requires enormous expenses on the supporting infrastructure. Apart from setting up the hardware and devices, the government also needs to spend money on educating the public to use it. When comparing the needs of government budget on public hospital service (very badly needed right now!) and other social services & assistance, the government should seriously consider the urgencies and priorities. ERP is not of any top priority.

Even if this is not a cost issue, this is not some money we need to spend now. According to a study done by Transport Advisory Committee in December 2014, the cause of traffic problem in Hong Kong is many-fold. One of the major reasons is the excessive number of vehicles in Hong Kong. For example, the study reported that private cars accounted for about 70% of all vehicles in Hong Kong in 2013, and the number of private cars had increased in 2003-2013 by about 40% whilst the growth rate of other types of vehicle stayed moderate.\* The government should consider ways to reduce the number of vehicles or at least control its growth rate to avoid further worsening of traffic congestion problem in Hong Kong.

Another reason the government should not spend money on ERP now, is because we should wait to see the impact of the Central-Wan Chai Bypass first. After the By-pass is opened, drivers who do not need to stop in the Central area can travel quickly to and from Sheung Wan and Fortress Hill. This should reduce the amount of traffic in Central and help ease the congestion in the adjacent areas. Therefore, the government really has no need to rush on ERP now and should review the necessity for a congestion charge or ERP after evaluating the positive effect of the Central-Wan Chai Bypass.

In addition, the government should perhaps look into ways to deter illegal behaviours that block roads and cause congestions. On an average weekday, it is not difficult to see illegal parking, double parking, "illegal waiting" etc. on the roadsides in Central area, where the roads are most congested. Law enforcement should be more often and more stringent to clear the roads for road users to speed up traffic.

On top of above reasons, the Eastern Harbour Crossing (EHC) is going to complete its operation franchise and should be taken over by the government later this year. This means the government will have the authority to adjust the price level of the tunnel in order to help divert traffic using the Cross Harbour Tunnel (CHT) and the Eastern Harbour Crossing. There is much space in lowering the pricing of the EHC in order to relieve Hong Kong people's burden and ease the heavy traffic into CHT,

## Opinion to be submitted to Transport Department in response to the Central District ERP Pilot Scheme

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which will ease the traffic congestion in Central/Admiralty/Causeway Bay on Hong Kong side as well as Hunghom/Tsimshatsui/Yaumatei on Kowloon side. The same goes for the Western Harbour Crossing, which is now way too expensive for the general public and therefore very much under-used. By 2023 when the franchise will expire, the government should definitely lower the pricing so as to divert considerable amount of overall traffic crossing the harbour each day.

In conclusion, there are still many ways to solve the congestion problem in Hong Kong (and in Central) and therefore, the ERP which is costly should have a low priority as compared with other means of improvement stated above.

Thank you very much for your attention.

Ir. Andrew Mario  
*MHKIE, CMILT*


*\*Page 56, Report on Study of Road Traffic Congestion in Hong Kong, December 2014, by Transport Advisory Committee.*

「中環及其鄰近地區  
電子道路收費先導計劃」  
區議會論壇

2016年2月2日

發言紙

第一部分討論  
收費區、收費機制、  
收費時段、收費水平

 如閣下發言希望以不記名紀錄，請在左邊方格內打✓。

鄧銘心議員  
油尖旺區議會

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- 備註：1. 請將發言紙放入第一部分抽籤箱內。  
2. 如被抽中發言，發言時間請勿超過三分鐘。



意見:

① 市民大部份不認為引入電子道路收費就可改善交通擁塞問題。

政府應該先加強路面管理及執法，同時引入了匯分流方案，中環、灣仔繞道還未開通，如通車後中環一帶仍塞車，才考慮引入電子道路收費計劃才是更切合實際。

② 一旦開始收費，如何遏止天價增幅？

③ 有什麼車輛可以獲得豁免？

④ 要做好周邊配套，在絕樽頸塞