

26 September 2019

REPRESENTATIVE WESLIE T. GATCHALIAN
Chairperson
Committee on Trade and Industry
House of Representatives
Batasan Pambansa Complex, Constitution Hills
Quezon City, Philippines

Dear **Representative Gatchalian**:

We are pleased to submit the Department's position on the proposed legislation, entitled:

House Bill No. 2468

**"An Act Mandating the Regulation of All Car Wash Facilities Nationwide,
and for Other Purposes"**

This is without prejudice to the Department's submission of additional inputs.

With my best regards.

Very truly yours,

RAMON M. LOPEZ
Secretary



OFFICE OF THE SECRETARY

DTI Position on

House Bill No. 2468

**“An Act Mandating the Regulation of All Car Wash Facilities Nationwide,
and for Other Purposes”**

The Department supports the objectives of the proposed legislation to safeguard the health of the general population and protect the environment by regulating car wash facilities and establishments¹

The increasing volume of cars in the country, as evidenced by motor vehicle sales reaching 357,410 units in 2018 from 97,063 units in 2005,² has made car wash facilities and establishments a viable business opportunity

However, this industry requires an average of 150 liters of water for conventional car wash facilities or 400 liters of water for traditional hose pipe washing per vehicle and generates significant amounts of wastewater, which may consist of oil and grease leaking during engine washing, high suspended solids from brake linings, sand, dust, surfactants, and discharges of heavy metal including iron, copper, zinc, and lead.³ These may be harmful to the ecosystem if discharged without treatment as they flow into drainage systems, streams, and receiving water bodies.⁴

To ensure that the car wash industry's negative environmental impact is abated, it may be prudent to regulate this industry with due consideration of the financial effect it may bring about in the operations of the enterprises involved. Although the construction of a water recycling system and water treatment facility within the premises of a car wash establishment, as stipulated in Section 2 of the proposed legislation, may aid in reducing its harmful effects, there may be other financially-viable options for these enterprises. A proper wastewater disposal system, for example, may provide a cost-effective alternative to business owners who may find it economically burdensome to construct their own water treatment facility

The stipulation that only non-hazardous cleaning compounds may be used in all car wash services must be aligned with the Department of Environment and Natural Resources' Environmental Management Bureau's (DENR-EMB) Chemical Control Orders (CCOs). These CCOs prohibit, limit, or regulate the use,

¹ Section 2 of House Bill No. 2468 includes all car wash facilities and establishments, whether operating independently or attached to a gas station, car dealer, car service center, and other similar establishments

² Board of Investments, Chamber of Automotive Manufacturers of the Philippines Inc., and ASEAN Automotive Federation

³ B.S. Shete and N.P. Shinkar, Use of membrane to treat car wash wastewater, *Int. J. of Research in Science and Advanced Technologies*, 3(1), 13-19, (2014).

⁴ J. Perkowski, S. Bzdon, A. Bulska and W.K. Jozwiak, Decomposition of detergents present in car-wash sewage by titania photo-assisted oxidation, *Polish J. of Environmental Studies*, 15(3), 457-465, (2006)

manufacture, import, transport, processing, storage, possession, and wholesale of priority chemicals that have been determined to pose serious risks to public health, workplace, and environment. In consideration of these CCOs, waterless car washes may also be encouraged.

Finally, any regulation on the car wash industry, which may be streamlined with the DENR's certificate of non-coverage (CNC) or environment compliance certificate (ECC) must be consistent with the government's Ease of Doing Business (EODB) initiative to strike a balance between enabling businesses and conserving the environment.

The Department reiterates its support for the objectives of the proposed legislation with due consideration of its recommendations. We likewise defer to the DENR on the specific measures in the attainment of these goals.

Kayapinchay

**Bureau of Trade and Industrial Policy Research
17 September 2019**

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