

**English Translation**

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電話號碼 Tel No. 2594 6200

傳真號碼 Fax No. 2511 3658

30 November 2004

Legislative Council Panel on Environmental Affairs  
Legislative Council Building  
No.8 Jackson Road, Central  
Hong Kong  
(Attn.: Clerk to Panel, Miss Becky Yu)

Dear Miss Yu,

**Greenpeace's position on air pollution control strategy**

We acknowledge the receipt of your letter of 25 October 2004. We have the following responses on Greenpeace's submission of 23 October 2004 regarding its position on air pollution control strategy to the Legislative Council Panel on Environmental Affairs.

(1) **Review of Air Quality Objectives**

Greenpeace has some misunderstanding on European Union (EU)'s air quality objectives (AQOs) and World Health Organization (WHO)'s air quality guidelines. The EU's AQOs allow for a larger number of exceedances. For example, the EU allows the hourly average sulphur dioxide (SO<sub>2</sub>) standard to be exceeded 24 times a year, whereas Hong Kong's AQOs allow only three exceedances a year. For respirable suspended particulate (RSP), the EU allows the

daily average RSP standard to be exceeded on 35 days in a year, whereas the corresponding AQO of Hong Kong does not allow a single day of exceedance at all. We therefore cannot make a direct comparison between the AQOs of the EU and those of Hong Kong.

WHO's air quality guidelines provide background information for setting of air quality objectives and the guidelines are not air quality objectives themselves. As pointed out in WHO's air quality guidelines, considerations such as the prevailing exposure levels, technical feasibility, pollution source control measures, abatement strategies, and social, economic and cultural conditions should be taken into account when turning the guidelines into air quality objectives for a particular place. As such, different countries and areas in the world adopt different air quality standards and objectives.

The AQOs adopted by Hong Kong have been developed mainly with reference to researches in the United States (US) and the situation in Hong Kong. Therefore, they are generally similar to those of the US.

We understand some organizations are keen for a review and tightening of the AQOs. The Government has all along been closely monitoring the researches and reviews on air quality standards conducted by different places. The review results of EU and the US on their air quality standards are expected to be available in 2005 and 2006 respectively. We will make reference to the outcome of these reviews as well as the results of local studies when considering the need for revising Hong Kong's AQOs from a scientific perspective and the local applicability of the revised AQOs.

(2) **The cooperation of Guangdong and Hong Kong in the energy aspect**

From an environmental protection perspective, there is room for cooperation between Hong Kong and Guangdong in power supply. At present, we are discussing with our counterpart in Guangdong on the feasibility of emissions trading between power plants of both places. However, developing renewable energy across the border involves more complex issues.

For Guangdong, there was a great structural change in electricity market in recent years. The growth of economic activities at high speed coupled with the continuous strong demand of electricity

means the supply of electricity in Guangdong will remain tense in the coming few years. Hence, Guangdong places great emphasis on the rational energy development and application to tally with its local development. At this stage, the potential of exporting renewable energy from Guangdong to Hong Kong is very limited.

Therefore, we consider it is not the right moment now to discuss with Guangdong on the cooperation of developing renewable energy. At this stage, we focus on the research of the possibility of using renewable energy extensively in Hong Kong. We also promote renewable energy to our citizen in a bid to help us together with Economic Development and Labour Bureau to study the role that renewable energy can play in the electricity market after 2008.

It is our understanding that CLP reduced the natural gas consumption because the recoverable reserve of the gas field, supplying CLP Black Point Power Station, was lower than the level originally estimated. Hence CLP burned less natural gas but used more coal instead in 2003. To address this issue, we have already requested CLP to explore measures to reduce its emission of air pollutants including the sourcing of new natural gas supply.

I trust the above have provided adequate background information. If you require other information, please contact the undersigned.

Yours sincerely,

( TSE Chin-wan )

for Secretary for the Environment, Transport and Works

c.c.: Hon CHOY So-yuk (Chairman of LegCo EA Panel)