



**Legislative Council Panel on Environmental Affairs
Special Meeting on 6 October, 2009**

Review of Air Quality Objectives

Submission of Civic Exchange

I. Set New Policy Goal

Civic Exchange welcomes the Review of Air Quality Objectives (AQO) as an important opportunity to reduce the threat to public health of Hong Kong's highly polluted air.

The government should state a new policy on air quality. Since 2006, Civic Exchange has proposed the following policy statement: *The HKSAR Government's policy goal is to improve outdoor air quality to the point where air pollution no longer poses a significant risk to human health as it does today.*

With a clear and explicit health-based policy goal, the Government will then be able to integrate internal policy-making and implementation, as well as to send the right message to polluters and the public.

II. Policy Formulation & Implementation

The public expects the entire administration to work towards air pollution reduction. The bureaux and departments responsible for the environment, health, planning, transport and development must not only 'coordinate' but must integrate their policy-making process, so that policies are properly aligned to achieve a stated goal.

We suggest the Legislative Council invite the Chief Secretary to address legislators on how this coordination, integration and alignment will be done under his leadership.

III. Response to the Consultation Document

We believe that:

- a. All the 19 measures proposed for Phase I action in the consultation document should be adopted, but additional measures are needed to deal with marine emissions (see d.).
- b. In light of emissions Hong Kong can effectively control, the Government must focus on roadside air quality, as vehicular emissions pose the most serious threat to public health.
- c. Early and determined focus must be placed to reduce pollutant concentrations from the most harmful sources – diesel buses and trucks – because emissions are emitted closest to where people are.

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- d. The very high toxicity of marine emissions must be acknowledged and reducing marine and port emissions should be a major part of Phase I emissions reduction.
- e. Actual emission levels in Hong Kong in fact allow the Government to advance its proposed SO₂ target (IT-1 at 125 micrograms per cubic metre) to IT-2 (50 micrograms per cubic metre).

IV. Upgrading Hong Kong's Bus & Truck Fleets

We welcome the Secretary for the Environment's recent commitment to support faster replacement of pre-Euro and Euro I franchised buses. However, we urge the promotion of the second tranche of clean bus upgrades from the Phase II to Phase I of the control measures.

We also note the slow uptake of the voluntary replacement scheme for highly polluting pre-Euro and Euro I diesel trucks. We do not believe this important source of toxic emissions can be tackled without regulation to encourage faster uptake of the voluntary replacement scheme.

For example, the Legislative Council should support the progressive increase of licence fees for the most polluting trucks, which was disappointingly rejected in 2008

V. Early Introduction of Marine Emissions Controls

We welcome the trials of cleaner fuels and retrofitting of catalytic convertors for local vessels. However, rather than focusing on methods, the Government should allow ship operators the freedom to choose any of the wide range of technologies available to reduce emissions.

Ocean-going vessels (OGVs), which emit huge quantities of SO₂, should be addressed during Phase I as well. Once a ship moors in Hong Kong, it is subject to local control. These ships can be required to burn a cleaner quality of fuel. By doing so, Hong Kong's SO₂ emissions can also be reduced. The port sector is concerned this will increase costs and challenge Hong Kong's competitiveness as a port. However, if Hong Kong and Mainland ports together adopt green ports policies this can be addressed. There are good working examples of such cross-jurisdictional collaboration from ports in North America, which Hong Kong and Guangdong could follow.

VI. Timeframe

Without clearly articulating for the community a timeframe for implementation of the various measures, as well as the levels of air quality improvements, polluters lack a strong signal that they must prepare to reduce emissions.

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