

Clean Air Network's statement

Air pollution is Hong Kong's most serious public health crisis, killing over 1100 people every year. I urge the Government to improve our air quality until pollution is no longer a significant threat to my health, by:

- Adopting the WHO Air Quality Guidelines and setting an early date to comply.
- Focusing clean-up measures on roadside emissions, the biggest local source of health impacts.
- Improving accountability by reporting the health impacts of air pollution every year.

Clean Air Network's response to the AQOs public consultation

1. Do you agree that the existing Air Quality Objectives (AQOs) need updating?

Yes. The AQOs have not been updated for more than 20 years, so the Government should definitely update them.

2. Do you agree that protection of public health should be the key consideration in updating the AQOs?

Yes, absolutely, protection of public health must be the PRIMARY consideration. Air pollution affects every single person in Hong Kong. Therefore, protecting public health is more important than protecting the interests of selected individuals, groups or companies. Just as I expect government to provide clean water and safe food, I expect government to provide clean air by regulating emissions and collaborating with Guangdong.

3. Do you agree that the AQOs should be set with reference to the guidelines and interim targets (ITs) published by the World Health Organization (WHO) and that a staged approach be adopted to update the AQOs with a view to achieving WHO Air Quality Guidelines (AQGs) as a long-term goal?

The WHO standards are a sound reference because they are EXPRESSLY formulated to protect public health. Upon resetting the AQOs, the Government must take immediate measures to substantially reduce emissions. Such

reductions are both financially and technologically possible. **I urge the Government to adopt the full WHO AQOs as soon as possible because air pollution is Hong Kong's biggest public health crisis.** It is worrying that the Government would call the achievement of healthy air a "long-term goal", when air pollution causes approximately 1,100 (avoidable) deaths per year. Stringent AQOs will give the government the sword it needs to fight air pollution.

A staged approach must never be an excuse to delay tough action. Air pollution is an URGENT problem, requiring IMMEDIATE measures. Thus, each phase of achieving the ITs must result in SUBSTANTIAL health improvements in the foreseeable future. No other government policy can be meaningful or acceptable.

4. Do you agree to the proposed new AQOs which have been set with reference to a combination of WHO AQGs and ITs?

NO. I urge the Government to choose stricter ITs than those currently proposed for sulphur dioxide, PM10 and PM2.5 because Hong Kong should be able to meet stricter guidelines.

Current, actual 24-hour levels of SO₂ are approximately 22 µg/m³, but the government is proposing an AQO of 125 µg/m³! The WHO AQG is 20 µg/m³. We are already so close to winning the victory on attaining the WHO's AQG on SO₂ that the Government's proposed new AQO makes no sense at all! Adopting the proposed AQO would literally grant a license to pollute to emitters such as power plants, when what is required is the opposite. How can the government expect the people of Hong Kong to accept a standard which would actually permit MORE pollution? If the Government adopts an AQO of 125 (instead of the WHO AQG of 20), the potential health impacts are an ADDITIONAL 480 deaths, 17536 hospital bed-days, and 0.18 million of doctor visits per year.

Regarding PM₁₀, the Government proposes an annual AQO of 50 µg/m³, but current annual levels are 55 µg/m³ already. I urge the government to tighten this standard further, since an improvement of 5 µg/m³ is negligible.

Regarding PM_{2.5}, the MOST dangerous pollutant because of its ability to penetrate deep into lungs and blood vessels, the proposed 24 hour/annual AQO of 75/35 µg/m³ is 2-3 times laxer than the standards in place in the US (35/15) and Australia (25/8) and significantly laxer than the EU standard (NA/25). For PM_{2.5}, I urge the Government to choose a standard in keeping with its global aspirations and image as a livable, first-world city.

5. Do you agree that a mechanism should be put in place to regularly review the AQOs no less than every five years?

Yes. A review mechanism backed by legislation would be a positive step towards a more proactive air quality management approach, leading to greater accountability and transparency in the Government's policymaking.

6. To what extent do you agree that the proposed emission control measures should be implemented for achieving the new AQOs and improving local air quality in general? What other measures do you think the Government should consider?

All the measures proposed in Phase I by the Government should be adopted as soon as possible. In addition, the Government should take an integrated and systemic approach that is designed to alter the behavior of polluters through a well thought-out combination of "carrots and sticks". For example, setting emissions caps for power companies has resulted in their adoption of emissions reduction technologies. The same approach – of caps – should be taken with commercial bus operators, so that they are automatically motivated to switch to cleaner technology and fuels. Similarly, the government can shape the behavior of commercial vehicle owners through a combination of carrots, such as subsidies to buy new vehicles, AND a stick, such as mandatory retirement of vehicles with outdated engines. (In fact, the Government already intends to implement the former.) Private vehicle owners will buy cleaner, more fuel-efficient vehicles if vehicle fees and taxes are correlated accordingly. A systemic "green port" approach would also lead to significant reductions in marine emissions through economic incentivization of vessel owners.

Next, I urge the government to continue its efforts to influence Hong Kong manufacturers in the Pearl River Delta. While the HKSAR Government does not have jurisdictional authority across the border, it has enormous convening power and undoubted influence. It can, for example, convene meetings with best-of-breed manufacturers and encourage environmental improvements. Moreover, government can work alongside NGOs to "name and shame" violators, when violations come its attention. **Government should consider mandatory environmental and sustainability reporting by Hong Kong companies with mainland manufacturing concerns.**

Finally, the Government must practice what it preaches. It can use its enormous procurement power to reward clean outcomes.

7. How soon do you think these proposed emission control measures should be implemented?

I pose the question to Government, what is Government's vision for cleaning up Hong Kong? By that, I mean that **Government must set a goal WITHIN A STATED TIME FRAME, then implement those measures necessary to achieve it.** For example, the pedestrianization of busy city districts would immediately result in dramatic improvements in roadside pollution. The difference in Central, for example, between weekdays and Sundays (when traffic is banned in just a small area) results in a 30+% reduction in roadside emissions, which, if permanent, would constitute a major improvement in terms of health. Requiring ships to burn cleaner fuels when parked at container terminals would similarly result in immediate and significant improvements. The point is, the right mix of policies could greatly shorten the time frame for delivering major reductions in emissions.

I urge Government to commit to substantial emissions reduction in order to improve public health by 2012 when the current administrations steps down.

8. Are you willing to bear the costs arising from the implementation of the proposed emission control measures, such as higher electricity tariff and bus fares, as well as adjustments in your way of living?

To begin, I am already paying for air pollution with my health.

Next, the question is not framed in terms which reflect the decisions which must be made. Rather, the question is based on the assumption that I, an individual member of the public, must bear the costs of clean-up alone. While it is true that the public must bear some costs, the government must allocate costs between the polluters, the public purse and the general public.

For example, the government seems reluctant to replace outmoded buses because "bus passengers will have to pay higher fares", but I don't see why this has to be the case. The Government has previously subsidized fares (or reduced the licensing fees paid by bus companies) to enable more people take the bus. Such subsidies were granted in order to increase mobility among the

economically disadvantaged, who could least afford hikes in bus fares. Why would the same logic NOT apply in this case? Regarding the supposed need for higher electricity tariffs, only last year, the Government gave a one-time injection of \$1,800 into every residential electricity account in the city.

Other examples show that the Government has the means to implement major abatement initiatives: In 2007, the Government earmarked \$3.2 billion to provide owners of diesel commercial vehicles a one-off grant to replace their old vehicles with ones that comply with the current Euro IV emission standards. Only \$323 million of grants was distributed as at end of August 2008, even after the program was extended. Finally, the Government is spending billions to prepare for a resurgence of swine flu this autumn. The Government took these measures without first asking the public, are you willing to pay for them? The Government's attitude, policy and allocation of resources to prevent deaths and adverse health impacts from air pollution should be no different than for other major public health crises.

In light of the above, YES, I am prepared to pay my share because the benefits will be significant.

9. Do you have any other views on the Review?

At the end of the day, whatever standards or measures are finally adopted are just tools to attain the goal of CLEAN AIR. The name of those standards and the metrics of measurement are much less important than HOW MANY HEALTHY DAYS we will have and HOW MANY PEOPLE WILL DIE or be hospitalized as a result of air pollution. It is the RESULT which is the most important thing. The current proposed AQOs will NOT lead to substantial improvement in air quality. **Whereas 1,100 people died from air pollution in 2007, "only" 950 will die from air pollution if we accept the Government's proposed new AQOs. I don't call that a real improvement!**