

15 May, 2013

The Hon Charles Peter Mok
Chairman
Bills Committee on Air Pollution Control (Amendment) Bill
Legislative Council
Room 917, Legislative Council Complex
1 Legislative Council Road, Central
Hong Kong

Dear *Charles*,

Air Pollution Control (Amendment) Bill

It is the long held view of the Hong Kong General Chamber of Commerce that Hong Kong should tackle the air quality issue as a matter of urgency, with a view to protect public health and maintain Hong Kong's competitiveness. As a matter of fact, we have been submitting many papers on various air quality issues to the Government since 1993.

We are glad that the Chief Executive has incorporated our proposal of a combination of subsidies and mandatory requirements to get dirty vehicles off the road in his Policy Address delivered earlier this year. In the same submission (attached), we supported the HKSAR Government's announcement on benchmarking the latest Air Quality Guidelines of the World Health Organisation ("WHO") in setting our own Air Quality Objectives ("AQOs").

The Chamber is supportive of a staged approach for updating the AQOs, as we understand that in the case of particulate matter emissions, Hong Kong is very much under the influence of regional pollution, and it is unrealistic to set the WHO Guidelines as short-term targets. However, such a staged approach should not be used as an excuse to delay updating whenever it is feasible. It is encouraging to see that the Government is moving towards amending the Air Pollution Control Ordinance (Cap. 311) so that the new AQOs will come into effect on 1 January, 2014.

We in principle support the Government's proposed transitional arrangement for Environmental Permits ("EPs") granted before the commencement of the new AQOs on 1 January, 2014, which specifies that their application for variation of EP before 1 January, 2017 would be considered on the basis of the old AQOs. This arrangement should allow proponents to submit variations to EPs without suspicion that more stringent requirements would be applied during the transition period. At the same time, we also welcome the establishment of a periodic review mechanism to gradually achieve the WHO's ultimate target and again this should be implemented without unwarranted delay.

Best regards,



Shirley Yuen
CEO