

**CAN's submission on government's proposal to tighten emission standard of newly registered motor vehicles**

In response to Environmental Department's (EPD) proposal of tightening emission standard of newly registered vehicles, Clean Air Network proposes the following comments:

1. CAN supports EPD's proposal to tighten emission standards of newly registered motor vehicles to Euro VI and LEV III respectively in phases as an effective means to improve roadside air quality.
2. Despite slight improvement of general air quality in recent years, roadside air quality has remained unsafe over the last 20 years and nitrogen dioxide level is always double the WHO's standard. This indicates Hong Kong is still suffering from serious roadside air pollution.
3. To better protect public health, focusing on reducing tailpipe emission is no longer effective as its marginal utility for reducing roadside air pollution has been decreasing. This reflects on the fact of high roadside air pollution despite the effort on phasing out polluting diesel commercial vehicles. The government should seek alternative ways to reduce source of emission instead of relying on roadside emission reduction measures.
4. The cause of roadside air pollution is uncontrolled vehicle growth. In fact, the number of vehicles has almost doubled over the last 20 years, which adversely affect life quality of Hong Kong citizens. There are already over 800,000 registered cars in 2015. Too many vehicles on the road will cause traffic congestion and worsen roadside air quality.
5. Since year 2000, EPD has invested HK\$14.3 billion on improving air quality, but the condition of roadside air quality is unsatisfactory. Furthermore, according to the Hedley Environmental Index of HKU School of Public Health, air pollution in 2016 caused 1686 premature deaths, 21.6 billion direct economic loss and 2.65 million additional doctor visits. Uncontrolled car growth will further threaten health risks and create huge financial burden on public expenditure.
6. CAN urges the next-term government to focus on planning and traffic management policy tools to curb car growth. The government is suggested to adopt London's experience to expand existing "low emission street" in Causeway Bay, Central and Mong Kok to a larger district, where high emission vehicles are prevented from entering. Electronic road pricing should be implemented as soon as possible to reduce congestion at central business districts. It is also necessary to adopt compact city planning in which walkability and cycling should be highlighted and rethink the thought of infrastructure-led new town development.

7. Diesel private cars are found to emit more NO<sub>x</sub> and RSP than petrol cars. The number of diesel private cars has already increased to 7,900. Measure to tighten emission standards to California LEV<sub>III</sub> may not be able to revert the uncontrolled growth of diesel private cars in the future, which is obviously a major risk for roadside air quality. CAN suggests the government to monitor the emissions and curb the growth of diesel private cars. If necessary, legislation should be considered to prohibit the registration of diesel private vehicles.

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