

HKIQEP Supports “A Clean Air Plan for Hong Kong 2035”



Hong Kong Institute of
Qualified Environmental
Professionals (HKIQEP)

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HKIQEP's Submission to the Hong Kong Legislative Council on "A Clean Air Plan for Hong Kong 2035"

The Hong Kong Institution of Qualified Environmental Professionals (HKIQEP) welcomes the release of the "Clean Air Plan for Hong Kong 2035" (CAP 2035) by the Environment Bureau (ENB) on June 29, 2021.

Air pollution is one of the most significant environmental health risks that affects everyone. It requires urgent and effective action at all levels. In view of the substantive time and investment needed to develop all the relevant supporting infrastructure and capabilities required to implement environmental management measures, the HKQEP considers that a good roadmap will not only help facilitate air quality improvement within the shortest time frame, but also provides a stable and predictable business environment that would encourage investment in developing more sustainable assets, operations and talent. The HKIQEP applauds ENB for developing the CAP 2035, which provides the much-needed vision and strategic framework to progress towards the goal of clean air.

Vision and Target

Being an advocate of green, visionary, and ethical leadership to better protect our environment and ensure sustainable living and economic development, the HKIQEP supports ENB's vision of "Healthy Living *Low-carbon Transformation *World Class" for developing Hong Kong into a low-carbon and liveable city. In realizing this vision, the ENB aims to improve Hong Kong's air quality to a level on par with major international cities before 2035, and in the long run, to fully meet the World Health Organisation's Air Quality Guidelines (WHO AQGs). Amongst others, New York and London has already achieved or pledged to achieving the WHO AQGs for fine suspended particulates (PM_{2.5}) by 2030. The HKIQEP supports early implementation of the initiatives set out in the CAP 2035 for enhancing both the public health and competitiveness of Hong Kong.

Under the Air Pollution Control Ordinance, the ENB reviews Hong Kong's Air Quality Objectives (AQO) at least once every 5 years. The HKIQEP urges the Government to establish a standing committee comprising environmental professionals and other relevant stakeholders to help conduct the AQO reviews, monitor progress on the CAP 2035 and recommend further action plans and timetables with a view to attaining the WHO AQGs.

Progress and Challenges

The HKIQEP is pleased that the Government's previous actions to improve air quality have delivered significant progress in reducing sulphur dioxide (SO₂), particulate matters (PM₁₀, PM_{2.5}) and nitrogen dioxide (NO₂) concentrations. It is encouraging that the levels of these air pollutants have decreased by 37 to 58% in ambient air, and 40 to 50% at roadsides, respectively, in the last decade.

Notwithstanding the above, the concentrations of PM₁₀, PM_{2.5} and NO₂ at roadside in Hong Kong remain high, and ozone (O₃) levels are also trending upwards and have reached a record-breaking height in recent years. The HKIQEP shares ENB's views that they are the current priorities requiring urgent and effective improvement actions.

HKIQEP supports the government strategy for progressive tightening of the AQOs towards the WHO AQGs. For pollutants that have yet to achieve the existing AQOs (NO₂ and O₃), HKIQEP expects that the policies outlined in CAP 2035 will bring them towards compliance in the next few years. For pollutants already attaining existing AQOs, we recommend the adoption of at least the next tighter targets (e.g. IT-3 for PM_{2.5} and PM₁₀ and AQG for SO₂) in the next AQO review.

Strategies and Actions

The HKIQEP concurs with ENB that the focus of Hong Kong's air quality policy is to enhance air quality to foster a healthier and more liveable environment for the community. The three strategies adopted by the ENB, viz., green technologies to advance low-carbon transformation, relentless emission reduction to build a liveable city and regional collaboration to tackle ozone problem, are appropriate in improving air quality, tackling climate change, and promoting a better and healthier living in Hong Kong.

As regards to the air quality improvement actions proposed against these strategies, the HKIQEP would like to provide the following comments.

a) Green Transport

The HKIQEP appreciates the Government's commitment to take forward the measures under the "Hong Kong Roadmap on Popularisation of Electric Vehicles" published in March 2021 for promoting the switch to electric vehicles in full speed. As commercial vehicles are the most important sources of air pollution at roadside, HKIQEP considers it appropriate for the Government to explore replacing all taxis and public light buses with electric models and accelerate the study of new energy buses and heavy-duty vehicles to help improve air quality and reduce carbon emissions.

Rail transport is a cleaner form of transport. The HKIQEP strongly supports that railways remain the backbone of Hong Kong's public transport network, complemented by walking, cycling and other low-carbon transportation. Towards this end, the Government should also speed up the construction of related facilities for establishing an environment-friendly road transportation infrastructure.

b) Liveable Environment

Good air quality and living environment are essential to preventing premature deaths. The HKIQEP welcomes ENB's initiative to commence a study to assess the long-term health effects of air pollution for evaluating the risk of premature deaths.

Effective communication of air quality health information and preventive actions helps save lives and improve quality of life. The HKIQEP is pleased that ENB will embark on a study for updating the Air Quality Health Index (AQHI) for better air quality health risk forecast and communication. HKIQEP considers it appropriate for ENB to incorporate also the long-term health risks in its updating of the methodology for reporting of the AQHI to help the public better understand and prevent air pollution risks.

c) Comprehensive Emissions Reduction

The HKIQEP appreciates the Government's continual efforts to reduce emissions from various sources - the measures outlined in the CAP 2035 are all welcomed.

d) Clean Energy

Ocean-going vessels (OGVs) are currently the most significant source of air pollutant emissions for Hong Kong. While the tightening of marine fuel sulphur content has significantly reduced the level of SO₂, the emissions of nitrogen oxides are largely unabated. The HKIQEP is pleased that the Government will examine measures to take forward the adoption of LNG in OGVs for addressing the issue. Moving forward, there should be consideration of future potential clean energy sources powering marine vessels such as through clean electricity or hydrogen for example.

It is a global trend to phase out fossil fuel in favour of green energy and to electrify where possible. The Government should try to expedite the transition where possible. Its' intention to phase out existing coal-fired power plants by 2030 should be implemented and it should consider electrifying as much of the transportation system as soon as is possible.

e) Scientific Management

The HKIQEP welcomes the initiatives to monitor compositions of volatile organic compounds and PM_{2.5} in real time, to conduct district-based air quality monitoring, and to apply micro-sensors for ambient and indoor air quality monitoring. The strengthening of the monitoring capability helps provide more timely and accurate scientific information with high temporal and spatial resolution for better air quality policy formulation and air pollution risk management. The HKIQEP urges the Government to ensure all relevant data, information and evidence will be accessible and transparent to the academics, environmental and health professionals, and the general public.

The HKIQEP fully supports the development of the proposed smart air quality monitoring system for providing district-based air quality information to the public. The information will be useful to strengthen the public's awareness and understanding of the risks they are exposed to in their daily lives.

f) Regional Collaboration

Hong Kong's air quality is strongly affected by cross-boundary emissions. The regional photochemical air pollution remains the most significant air pollution issue that needs to be tackled urgently. There is a strong need for closer cooperation with Guangdong and neighbouring cities in the Greater Bay Area to formulate effective policies and programmes to improve regional ozone pollution. The HKIQEP is pleased that the ENB is working with the Guangdong Provincial Government to formulate regional targets for 2025 and 2030. In addition to emission reduction targets, the HKIQEP considers that both Governments should also aim to establish regional air pollutant concentration reduction targets to ensure more effective air quality improvement.

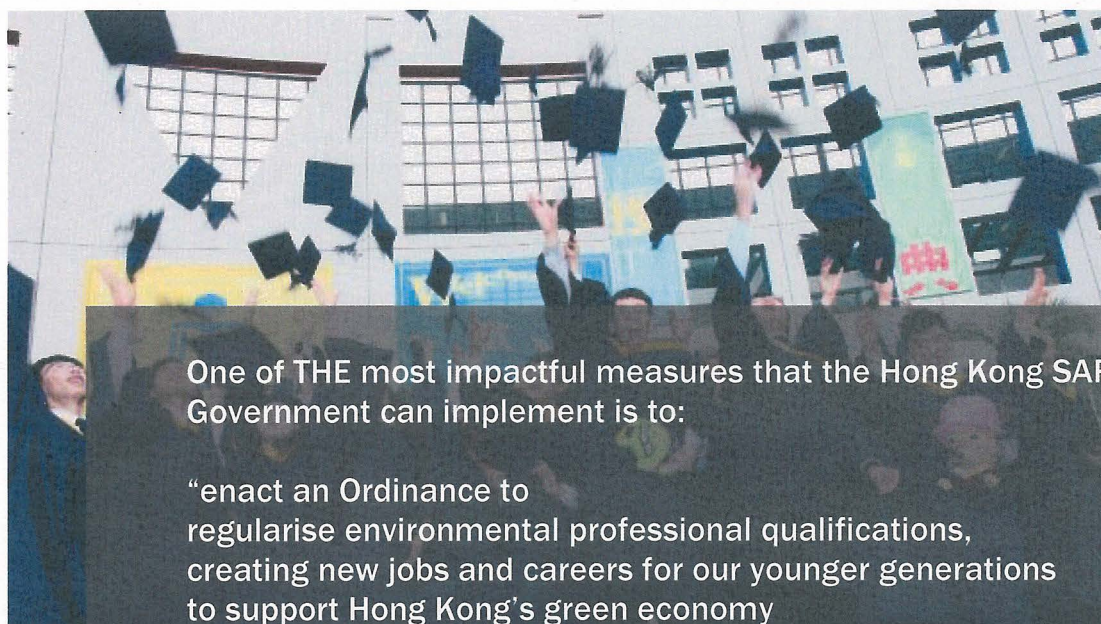
HKIQEP Support

Tackling air pollution requires joint and sustained efforts from all sectors and professions, apart from the proactive leadership of the Government. The HKIQEP will be more than glad to offer any necessary professional advice and assistance to help Hong Kong achieve better air quality and more liveable environment.

Hong Kong should not carry on with the misperception that a free economy equates to having no or less regulation. In many cases, creating new regulations and standards that are appropriate and reasonable, will create new job opportunities as well as deliver on the desired policy objective, such as reduction of air pollution or any other form of environmental pollution. The HKIQEP supports the development of appropriate environmental-related policies and regulations as we believe they can help position and create for Hong Kong, new market opportunities within the Greater Bay Area.

HKIQEP Contact

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One of THE most impactful measures that the Hong Kong SAR Government can implement is to:

“enact an Ordinance to regularise environmental professional qualifications, creating new jobs and careers for our younger generations to support Hong Kong’s green economy and ranking as a world class smart and healthy city.”

重專業，規範環保資格
撐青年，創造環保就業
保民生，拓展綠色經濟
共構建，健康智慧都會

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