



Hong Kong General Chamber of Commerce  
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Ms Maisie Cheng Mei-sze, JP  
Director of Environment Protection  
16/F, East Wing, Central Government Offices,  
2 Tim Mei Avenue, Tamar  
Hong Kong

*(By Email and Post)*

Dear ~~Ms Cheung,~~ *Maisie,*

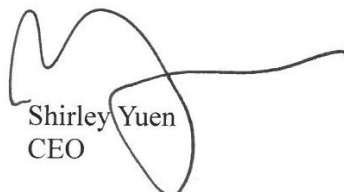
**Public Consultation on 2025 Air Quality Objectives Review**

The Hong Kong General Chamber of Commerce (“HKGCC”) welcomes and supports efforts by the Government to progressively tighten the Air Quality Objectives.

Despite improvements to air quality in recent years, there is still much to be done. It is notable that between July and October this year, the Environmental Protection Department issued multiple warnings of the ‘very high’ to ‘serious’ risks to health caused by air pollution. These warnings serve as a compelling reminder that air pollution remains very much a public health challenge that needs to be addressed through more ambitious targets and closer collaboration among businesses, civil society and policy makers.

We are pleased to submit for your consideration our suggestions for achieving better air quality in Hong Kong and look forward to working with the Government to take forward plans in this regard.

Yours sincerely

  
Shirley Yuen  
CEO

*Encl.*

cc: Air Policy Group (1)

## Public Consultation on 2025 Air Quality Objectives (“AQOs”) Review

### Response by the Hong Kong General Chamber of Commerce

#### Introduction

1. HKGCC recognises the effort by the Government to improve the air quality in Hong Kong over the years. Good air quality is a step towards transforming Hong Kong into a more sustainable city with better quality of living. This will help to maintain the overall competitiveness of Hong Kong in attracting and retaining talent.
2. We support the approach to progressively tighten the air quality standards to achieve the World Health Organization’s Air Quality Guidelines (“AQGs”) levels, through continuously exploring new air quality improvement measures, based on practicability, whilst balancing the development of the society.
3. The Consultation Document (“CD”) has identified a number of new air quality improvement measures to achieve higher air quality standards in the areas of energy and power generation, and greener road and marine transportation (e.g. greater use of cleaner fuels). **Concerted efforts are required from business and consumers alike to implement the new air quality improvement measures to achieve tightened air quality standards.**
4. Hong Kong’s air quality is an issue of concern to Chamber members, and something that affects our competitiveness as a place to do business and attract and retain the best. There have been considerable improvements over the last 10 years but much more remains to be done.

#### AQOs for 2025

5. The Government proposes tightening 3 targets for the 2025 AQOs, for 24-hour Sulphur Dioxide (SO<sub>2</sub>) and for Particulate Matter PM<sub>2.5</sub> on both an annual and 24-hour basis.
6. **The Chamber supports these proposals but believes these can go further.**
7. For SO<sub>2</sub>, it has been proposed that the 2020 limit will be tightened to the WHO IT-2 target level. As most SO<sub>2</sub> is emitted locally, largely from the marine and power generation sectors, we believe that Hong Kong should strive to further improve performance in this regard. According to the CD, attaining the AQGs’ ultimate target air concentration of 20 or less in 2025 would be difficult based on air quality modelling for 2025. A figure of 30 is however achievable. The foregoing notwithstanding, **we believe that the Government should be more ambitious and do its utmost to aim for a reduction in SO<sub>2</sub> levels of 20 or better but no more than 30 by 2025.**
8. The Government has not proposed any tightening of the target for Particulate Matter PM<sub>10</sub>. Although emissions of PM<sub>10</sub> are largely a regional than purely local problem, **the Government should commit to working closely with Guangdong and to tighten the**

**target to IT-3 at the next AQO review, given the impact of this pollutant on public health as it can be drawn deeply into the lungs.**

9. Particulate Matter <sub>2.5</sub> is also affected by regional emissions and we welcome the tightening of the target to IT-2 levels on both an annual and 24-hour basis. However, we have concerns over the increase in the number of exceedances allowed from 9 to 35 on a 24-hour basis. According to the CD (page 26), there were 30 exceedances over a 24-hour period at this new level in the last few years. **Given the measures expected to be in place by 2020, we see no reason for setting a level of exceedance that is higher than 30 beyond 2025. We therefore strongly advocate a level that is lower than this.**
10. We note that the AQOs for 2025 in respect of Ozone (“O<sub>3</sub>”) will remain unchanged. Although this is expected given concentrations are on a rising trend, 2025 forecasts indicate that much of Hong Kong will be unable to meet existing standards. The Chamber appreciates that the issue of O<sub>3</sub> emissions are complex and poses a challenge across the Greater Bay Area (“GBA”). However, the lack of concrete proposals in Annex C to address this is most disappointing. **An action plan to better understand root causes and to then reduce their impact over the next 5-10 years needs to feature strongly in government’s proposals for air quality until 2025.**
11. Similarly, we note the Government’s acknowledgement that roadside Nitrogen Dioxide (“NO<sub>2</sub>”) concentrations remain twice that of the AQO targets for 2020. **Mitigation measures, such as the regulation of road transport, are available to bring down NO<sub>2</sub> sharply. The Government should therefore adopt more vigorous measures in this connection given the serious health risk to pedestrians and other members of the public.**
12. Although public health is and should be the key driver for improving air quality, this is not reflected in the prioritisation of filters as given in the list of potential control measures; It is accorded a much lower importance than that warranted. **Looking forward, we urge the Environmental Protection Department (“EPD”) to begin its process of reviewing potential control measures and the merits of selecting different levels and numbers of permitted exceedances by first determining the public health benefits, and to only then apply consideration to other factors such as cost, timeframe and practicability.** This will focus the energies of the review process on maximising public health benefit, which is the intended purpose of the AQO process.

### **Mitigation Measures**

13. A key contributor to air pollution is the combustion of fossil fuels. The Council for Sustainable Development has recently conducted a public engagement exercise<sup>1</sup> to help develop a long-term decarbonisation strategy for Hong Kong. Reducing fossil fuel use would also give rise to lower carbon and air pollutant emissions.

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<sup>1</sup> [https://www.susdev.org.hk/download/pe\\_document\\_e.pdf](https://www.susdev.org.hk/download/pe_document_e.pdf)

14. In the above connection, we would like to reiterate our proposals on the main mitigation measures made in our submission on decarbonisation<sup>2</sup>. These are:

- **Increase the proportion of zero-carbon energy Hong Kong**, mostly through regional cooperation, with additional supplies of nuclear together with imported renewable energy (“RE”), together with support for local RE projects
  
- **For public mass transit, the Chamber supports the government’s policy of a “rail first” approach.** We believe that steps should be taken quickly to move beyond initial plans to the active pursuit of design, build and transfer options for building additional lines that have already been identified. **The Chamber also calls for introducing low emission buses for road-based mass public transit complemented by the provision of more comprehensive public and private electric charging networks.**
  
- **We suggest that the Government consider a range of policy measures to significantly increase the uptake of electric vehicles (“EVs”)**, which has declined following the 2017 reduction in the first registration tax waiver for EVs. Possible measures include not only capital cost incentives for companies and individuals but also tax relief or other support for the installation of charging networks. The Government should also consider introducing an end-date for the registration of new internal combustion engine cars, perhaps by the mid-2030s, to align with measures adopted in other developed economies. **Carpooling should be encouraged in the short to medium term as a way to not only help improve air quality but also address the city’s chronic traffic congestion. Ultimately, the government should consider discouraging the use of private cars, if Hong Kong is to achieve best practice roadside and carbon emissions levels. Consideration should also be given to expanding the scope of the Pilot Green Transport Fund to include non-road mobile machinery (“NRMM”).** This will encourage NRMM fleet owners to test the capabilities of pioneering new technologies for vehicles that must otherwise burning diesel. For Heavy Goods Vehicles, tighter regulation and the separation of such vehicles from pedestrians through better urban planning is also required.
  
- **For marine transport, consideration should be given to helping owners and operators achieve electrification wherever possible.** This would help reduce both air and carbon emissions through such means as electric ferries, shore to ship power and electric-powered cargo handling facilities. In addition, Liquid Natural Gas (“LNG”) bunkering for local vessels supplied by the new offshore LNG terminal now being built in Hong Kong water, would serve as a good solution in reducing air emissions.
  
- We support the Government to continue to promote walkability to reduce reliance on mechanised transport for short-distance commuting. Other than environmental benefits, a more walkable community would encourage physical activity, which is

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<sup>2</sup> <http://www.chamber.org.hk/FileUpload/201909241043466962/Public%20Engagement%20on%20Long-term%20Decarbonisation%20Strategy,%202020%20Sep%2019.pdf>

essential to the public's health. In terms of economic benefits, a pedestrian-first policy promotes accessibility, as well as better business opportunities as a result of the increase in footfall. **The Government should therefore consider ways to incentivise businesses and property developers to build more walkable neighbourhoods.**

15. Indoor air quality is also a concern. **The Government should strengthen public education on the exposure to Volatile Organic Compounds ("VOCs") and products of combustion of fossil fuels (such as gas or LPG) inside buildings. It should also develop an emissions framework for and provide support to building owners, managers and occupiers to reduce use of such fuels.**

### **A New Clean Air Plan for Hong Kong**

16. Hong Kong's Clean Air Plan<sup>3</sup> was published in 2013. It is now time that it be updated. Many of the initiatives noted in Annex 3 of the AQO public consultation document do not have clear action plans, timelines or expected outcomes, which are necessary if Hong Kong is to achieve better air quality. Many of the proposals in Section C of Annex 3 can be brought forward to have an impact before 2025 and contribute substantively to better air in 2030.
17. **We therefore suggest that a new edition be published next year** following the conclusion of this consultation exercise and the finalisation of the 2025 AQOs. This would have the benefit of setting out concrete proposals to materially improve air quality in time for the next five-year review cycle.

### **Measuring Air Pollution and Public Data Provision**

18. Hong Kong has a limited number of monitoring stations with only three of these collecting roadside air pollution data. This contrasts with the far more sophisticated networks in other leading cities.
19. As an example, London has a comprehensive programme to install more sampling stations and to provide and map pollutant levels in real-time. These are often located in areas that are regarded as having public health risk – such as at the roadside or near schools or kindergartens. Comprehensive datasets are available online and mapping tools make it possible to plan walking or cycling routes that avoid areas with high concentrations of pollutants such as NO<sub>2</sub>. These include such user-friendly websites as Breathe London (<https://www.breathelondon.org/>), and the Greater London Authority's datasets on emissions (<https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2016>) and air quality (<https://data.london.gov.uk/publisher/gla-and-tfl-air-quality>). **The Government should plan to have equivalent data sets and services available for Hong Kong by 2025.**

### **Regional Air Pollution**

20. The Chamber welcomes and supports the efforts by the Hong Kong and Guangdong Provincial governments to strengthen cooperation in reducing air pollution, which have seen falling concentrations of SO<sub>2</sub>, NO<sub>2</sub> and PM<sub>10</sub> over the last 10 years<sup>4</sup>. However, and

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<sup>3</sup> [https://www.enb.gov.hk/en/files/New\\_Air\\_Plan\\_en.pdf](https://www.enb.gov.hk/en/files/New_Air_Plan_en.pdf)

<sup>4</sup> [https://www.epd.gov.hk/epd/sites/default/files/epd/english/resources\\_pub/publications/files/PRD\\_2018\\_report\\_en.pdf](https://www.epd.gov.hk/epd/sites/default/files/epd/english/resources_pub/publications/files/PRD_2018_report_en.pdf)

as noted above, O<sub>3</sub> continues to be a challenge. **The Government should therefore take urgent action to coordinate with its counterparts across the border to reduce precursor pollutants and give priority to O<sub>3</sub> reduction in planning for a better standard of air quality in GBA.**

### **Summary and Conclusion**

21. Poor air quality is an issue that affects everyone in our city. Setting stringent yet achievable AQOs for 2025 is important to not only enhancing public health but in sustaining Hong Kong's reputation as a smart city that is supported by strong environmental performance. This will help individuals and businesses alike to prosper.
22. Whilst we support the proposed tightening of the AQOs for 2025, more could be done with respect to the reduction of SO<sub>2</sub>, Particulate Matters and NO<sub>2</sub>. Similarly, although we recognise the role that AQOs play in the EIA process, more ambitious targets or action plans are needed.
23. Effective instruments to improve air quality already exists. These mitigation measures also have the co-benefit of reducing carbon emissions. It remains for the Government to speed up implementation to make Hong Kong a world-class city that is greener and cleaner.

HKGCC Secretariat

October 2019