



香港女工商及專業人員聯會

## HONG KONG WOMEN PROFESSIONALS & ENTREPRENEURS ASSOCIATION LIMITED

### RESPONSE TO PUBLIC CONSULTATION ON AIR QUALITY OBJECTIVES REVIEW

The Hong Kong Women Professionals and Entrepreneurs Association Limited (HKWPEA) respectfully submits our views in response to the Hong Kong's Air Quality Objectives in the pursuit of clean air and a green living environment. HKWPEA is a non-profit organization comprising a broad spectrum of professional and business women with a mission to enhance professional standards, training and business opportunities as well as to provide mutual support for its members. We value the opportunity to present opinions to the Government on various policy consultations and public issues and see it as a contribution to the community we serve. The views represent that which are being held from a cross-section of HKWPEA members holding significant positions in the public and private sectors in Hong Kong.

#### OVERVIEW/PRINCIPAL POSITION

Hong Kong's environment is one of the community's most important assets. We note and appreciate that the government has been making attempts to address the deteriorating environment as a result of economic development, among other things, but are concerned with the apparent lack of prompt actions to address/mitigate the situation. Rather, various past consultation processes seem to be repeating over time and, while we continue to talk, our environment has worsened fast. With regard to our air quality, the community is getting impatient and can become cynical if this goes on. Hong Kong will choke if our air quality does not improve. A few overall views/principles from us are laid down as follows:

- 1) Past consultation/public mandate obtained should be utilized to introduce policies to avert environmental erosion asap eg Researches and recommendations of the Sustainable Development Council (regarding urban living space, municipal wastes management, better air quality etc.) seem to have been conducted but not heard nor heeded. Public confidence will grow if the government is clearly seen to be positively, firmly responding to various consultation exercises with timeframes, albeit sometimes they have to be tentative, on what will be achieved by when. When the public see that things can turn for the better, there will be much more positive energy, momentum and support to take further steps to protect our environment. Environmental awareness and contribution may become part of the culture of Hong Kong in time if there is more transparency on what happens after consultations.

- 2) The government must think and behave in an exemplary manner to champion environmental protection. Change is a mindset game and has to be led. If all government offices are seen to be moving constantly and consistently towards being environmentally more friendly (as some are), then the public would not only see how this can be done but also gravitate around the movement. Incentives in all sorts of government policies should be framed with environmental protection as a basic requirement/goal.
- 3) More seems to have been debated under one 'R' (recycle) in the 3R regime – reduce, reuse, recycle. Too little public education/communications has been dedicated towards reduction and reuse as two fundamental steps in environmental protection. The community, our young generation in particular, must be encouraged not to waste, not to put convenience above everything else, not to chase imminent gratification at the expense of long term cost etc. as a matter of priority. Recycling programmes can be expensive and complicated to implement but reduction and reuse require only changes at the individual level first hence should be easier to introduce. The District Councils and Housing Authority/Society can play much more meaningful roles in district/estate-based reduction/reuse campaigns.
- 4) Efforts to improve our air quality should be all encompassing but must not be heavily dependent on stakeholders and causes outside the control of (the people of) Hong Kong eg cross boundary environmental improvement collaboration, power company fuel changes or energy-wise programmes led by them. Instead, we should start with individuals (ourselves), start small but in a steadfast, determined manner. Air Quality Objectives proposals will be better supported if roadside pollution, for instance, is improved by mandating road pricing or initiatives with similar goals – to discourage increased private vehicular commuting.

### **AIR QUALITY OBJECTIVES**

Air pollution is a concern widely shared by the community in Hong Kong and overseas parties intending to relocate to Hong Kong. We support the pursuit of ultimate compliance with the WHO Air Quality Objectives (AQOs). To reduce the current concentration levels of air pollutants in Hong Kong, the HKWPEA believes the Hong Kong government should implement the following range of measures to control emissions from motor vehicles, power plants, and industrial and commercial processes locally. We understand the sacrifice that will need to be made as a result and that they may bring about inconveniences, higher electricity tariff, transport fares and operation costs. However, compared to the growing concern of global warming/climate change and the local air quality deterioration, these 'sacrifices', or changes, are deemed necessary for our survival. Put in context, they are actually inconsequential. We recommend the following to be considered and a timeline be set to ensure clarity in terms of when the goals are meant to be achieved.

The power sector is the largest source of emission in Hong Kong. We should mandate/provide incentives for power plants to reduce fuel burn, reduce/capture emissions etc both locally and across the boundary, eg by introducing Carbon Capture and Storage (CCS) and sulphur-free coal as a cleaner substitute for electricity generation. There is need for the government to work out with the power companies a timeline on the use of sulphur-free coal or the installation of desulphurisation systems for existing coal fired plants.

The HKWPEA supports the ongoing rationalization of bus routes to reduce the number of vehicles on the road. We agree to replace, in phases as per timeline, or immediately, aged and heavy polluting diesel vehicles, particularly buses, with models meeting the Euro standards.

We would like to see faster facilitation of the wider use of hybrid / battery electric vehicles (BEV) or other proven environmentally friendly vehicles. Fewer pollutants are emitted by these vehicles hence they can help improve urban air quality imminently. Among all challenges, recharging stations have to be accessible to multiple public and private car parks along with ethical consumption restrictions to ensure people consume electricity responsibly. We believe the government should spearhead this symbolic and substantive environmental change by pooling in resources and coordination among all relevant departments/bureaux. No single bureau/department can do it alone. Government should take the lead by setting up such recharging facilities in government properties and public areas where feasible.

We would like to see the use of ultra low sulphur diesel (ULSD) in local marine vessels. Domestic ferries are a major source of local maritime air-pollution, accounting for 40% to 70% of the pollutants emitted from all local vessels. With the sulphur content of ULSD being approximately 1% only of that of the marine light diesel currently used by ferries, it is potentially the way to go. The current government trial in this regard will determine the technical feasibility of all domestic ferries using ULSD. We recommend speeding it up as far as possible. Would the government consider regulations to control emissions from vessels under the Air Pollution Control Regulations? A timeline should be set for marine vessels to go to low sulphur diesel and help reduce emission.

The HKWPEA sees the potential of implementing low emission zones (LEZs) and car-free zones / pedestrianisation schemes around Hong Kong. This will help reduce exposure to roadside air pollution in busy areas such as Central, Mongkok and Causeway Bay and will bring about considerable health benefits to the population within these zones. Legislation for vehicles to turn off their engines while waiting should be expedited and government vehicles, school buses should be the role models. They should have their engines turned off when waiting. A good example is the operation of taxis in Discovery Bay, where they are required to turn off the engine in temperatures at or below 25 degrees Celsius.

We support the expansion and development of railway-based transportation and cycling networks. We recognize the significant potentials of 'Park n' Ride' arrangements in new and selective districts of Hong Kong.

For energy efficiency measures, we concur that a mandatory implementation of building energy codes should be enforced. Buildings take up about 90% of the electricity consumed in Hong Kong. We recognize that this is an area where significant energy savings and emission cutbacks can be achieved. Government should educate the private and public housing sector on the financial incentive/saving for using energy saving measures.

However there is the problem of who will ensure its implementation, which could be costly and practically unfeasible. Should this be successfully managed, it is important to note that a reduction in energy use may automatically result in increased electricity tariffs, under the current Scheme of Control with the power companies.

We support the Energy Efficiency Labelling Scheme (EELS) that aims to facilitate the public in choosing the whole range of energy efficient products, raise public awareness on energy savings and reduce electricity consumption hence emissions.

We also encourage the use of light-emitting diode (LED), which is more energy efficient and has longer service life than traditional light sources. This proposal is under technical feasibility and public acceptance evaluation. We propose that this process be sped up and LED energy labeling be implemented asap. Light pollution is also becoming worse. This is a new area for regulation. Non-essential lighting should be discouraged. We propose the introduction of LED energy labeling so that the public can enjoy choices of the most energy saving systems to suit their needs.

All in all, the Air Quality Guidelines (AQG) issued by the World Health Organization (WHO) provides a good source of reference for all countries to build air quality standards to minimize the risk posed by air pollution to public health. We agree that the protection of public health is very important. However it should not be taken to the extreme and may best be considered in moderation and in phases. WHO AQGs should be taken as a long-term goal with reference to international practices, the latest technological developments and local circumstances. A timeframe, of approximately 5 years, should be set to review how Hong Kong is progressing towards the goals. We understand that the industries have yet to be consulted in the Air Quality Objectives Review, so the feasibility of the 19 points being discussed remains unclear. To prevent further delay, we request that the related industries be consulted within 3 months.