



## 2025 Air Quality Objectives Review

In response to the invitation from the Environment Bureau/Environmental Protection Department ("EB/EPD"), the Chartered Institute of Logistics and Transport in Hong Kong ("CILTHK") would like to give views and comments on the findings of the AQOs review working group, in particular those proposed new measures relating to road and marine transportation.

### General

The CILTHK is in general support of measures proposed to improve air quality, in particular the concentration of PM10, PM2.5, NO2, SO2, and O3. We note that the measures are divided into short-, medium- and long-terms and classified those considered to be not practicable, short of air quality benefits or not suitable to be considered under the current scope of the review as "others". The focus of the current review is mainly on the air quality improvements in 2025, i.e. short-term measures, and the scope for tightening the AQOs. We note also that EB/EPD estimated that the implementation of the committed and new measures will bring about continuous reduction in the concentration of PM10, PM2.5, NO2, and SO2, but a slight increase in the projected O3 concentration due to high regional background concentrations.

Though we are in support of the proposed short-term measures, we fail to see the determination of the government in putting efforts to improve our air quality. We note that :

- The proposed measures are basically high-sounding principles and concepts without concrete implementation plans. Most are still in the conceptual stage such as reviewing the tunnel toll policy, raising public awareness on vehicle maintenance, fostering pedestrian-friendly and bicycle-friendly environment, etc.
- The measures mostly follow that advocated in the past without any new ideas to stimulate more initiatives in bringing air quality improvement.
- Of the 14 short-term measures proposed under road transportation, the only one measure that is mentioned as having quantifiable emission reduction results is to "enhance district-based publicity on bus route rationalisation". Publicity alone without complementary action plans and incentives would not be able to bring about bus route rationalisation.
- Some measures can be considered for implementation in phases. Examples include electric vehicles pilot schemes, use of chassis dynamometer for testing vehicle tailpipe emissions, etc. However, they are either put under the long-term measures or under "others" without giving thoughts on their potential benefits to air quality if they are to be put forward for implementation, even on a partial basis.
- The measures have not taken into account latest development in the transport scene. We note that the Transport and Housing Bureau (THB) is pushing hard with the electric



road pricing pilot scheme. They also plan to introduce free flow tolling system upon the commissioning of the Tseung Kwan O - Lam Tin Tunnel in late 2021. These measures would have effect on air quality improvement locally.

### Specific

We have the following specific comments and observations with particular reference to the short-term improvement measures in road and marine transportation :

- While we note that the road harbour crossing rationalisation scheme is held in abeyance for the time being, the THB is planning to introduce free flow tolling system in Tseung Kwan O - Lam Tin tunnel upon its commissioning in 2021, with an aim to expand it to other government tunnel. Such measures would have air quality benefits and should not be left under the "others" category.
- The effect of maintaining an information database of vehicle tailpipe emission system on air quality improvement without any followed up measures is doubtful. On the other hand, while it may not be practical to use chassis dynamometer for testing vehicle tailpipe emissions for the whole vehicle fleet, phased implementation in particular for commercial vehicles can be considered in the short-, medium- and long-terms with an aim to impose more stringent vehicle exhaust test and hence more attention on vehicle maintenance.
- The one major difficulty in introducing a “bicycle-friendly” environment is the provision of ancillary facilities such as cycling track network, bicycle parking spaces, park-and-ride facilities at public transport interchanges, etc. In view of the limited land resources in Hong Kong, early action has to be taken in the town planning stage to include these facilities wherever appropriate.
- We agree that the use of urban planning and design solutions together with transport management would help improve air ventilation. Early action has to be taken to revise the town planning standards to that effect. There are points that should be taken note of in the urban planning and design stage, including,
  - to give priority to public transport users in the design;
  - to involve public transport operators in the design stage to provide the most direct public transport route to avoid unnecessary detour leading to air pollution problems;
  - to provide off-street loading / unloading facilities for commercial vehicles and tour coaches to avoid prolonged on-street activities causing congestion and hence air pollution, etc.
- The public should be encouraged to use public transport systems as far as practicable. In order to achieve this, the public transport system has to be attractive. Means to improve the attractiveness of public transport may include :
  - to introduce public transport priority measures,
  - to provide comfortable waiting and interchange environment,
  - to provide incentives to public transport users through some reward point systems to encourage them to use the most eco-friendly transport modes, such as the incenTrip used in Washington DC / Baltimore, etc.



- We support bus route rationalisation but more focused actions and new complementary ideas or incentive schemes would be needed to facilitate implementation. More large-scale bus-bus interchange schemes such as those in Tuen Mun Highways and toll plazas should be introduced.
- The emission from local ferries has adverse impact on our air quality. More action should be taken to improve the environmental performance of local vessels.
- We support the provision of low-emission transport modes to the residents of new development areas (NDAs). For the north-western part of Hong Kong, expansion of the light rail transit system with better grade separation would be an option worthy of pursuing.
- Mobile application to facilitate the choice of the most time-saving, economical and low-emission transportation modes is a must. Nevertheless, it may not necessarily be a one-stop service as it would turn out to be fairly complicated and slow. Consideration may be given to adopt a common platform to facilitate different users to choose what suits them most.
- There is a need to manage vehicle growth. However, we fail to see measures proposed to achieve this aim.
- Illegal parking needs to be enforced. Technology should be deployed to help in the enforcement actions.
- There are measures under the "others" category which we consider should be considered further in view of their environmental benefits :
  - Promotion of hybrid private cars
  - Review the policy on replacement of franchised buses

We note that the government has spent tremendous efforts in an attempt to improve the air quality in Hong Kong. While we appreciate some improvements in the local environment, there are still much to be done. The CILTHK is in support of progressively tightening the air quality standards to achieve environmental improvement as a whole in Hong Kong. While we support most of the measures proposed by the AQOs review working group, we suggest more concrete implementation plans to be worked out. More incentives or subsidies should be given to the public transport operators to catch up with the upgrading of environmental improvement of vehicles / vessels in an early and practicable manner. In addition, more work should be done on the town planning, design and standard side to take note of the air ventilation system in development areas, to give priority to public transport users, to provide adequate facilities for the competing users, etc.

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