

24th November 2009

Air Policy Group
Environmental Protection Department
33/F, Revenue Tower
5 Gloucester Road
Wan Chai
Hong Kong

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103 Hennessy Road
Wanchai Hong Kong

Dear Sir,

Air Quality Objectives Review Public Consultation

We are writing in response to the above consultation exercise.

Overview

We welcome the review and support the move towards more stringent air quality standards. We would like to see an early statutory revision to the current Air Quality Objectives, meeting the final WHO standards on a step by step basis. We support establishing a regular review mechanism; a five year interval is a good start. We hope that a far-reaching programme of transport measures can be agreed for implementation to improve our roadside air quality. We comment below on your proposed measures from the land transport point of view. We leave it to other fora to discuss the implications for marine and air transport.

Institutional Arrangements

The proposed measures are ambitious and will require political will to be implemented. They also cross different areas of responsibility within the government. The review is "environment led", but the measures are both "environment focused" and "transport focused", or, in the case of pedestrianisation, will need co-ordination between several Bureaus. **We welcome** the Chief Executive's announcement in his policy address that the Chief Secretary for Administration will coordinate the relevant work.

Who pays?

We generally support the principle that the users should pay for additional costs of improved standards. However, in order to achieve early improvements, it may be necessary to grant subsidies to operators as was done when converting taxis to LPG operation. Short term subsidies may be necessary in order to spread the impact of increased costs to users over time, thereby making changes acceptable. For similar reasons, it may also be necessary to subsidise some of the trial schemes noted below. **We propose** that the government consider granting direct subsidies where necessary.

Promote electric and other alternative cleaner fuels

One practical problem is that the new Euro technology is complex, expensive and may not be as efficient as the older technology. For this reason, **we propose** that Government explore alternative clean/cleaner solutions, with the focus on shifting to

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electric energy wherever possible. More economical alternatives would give the trades concerned more incentive to improve.

We further propose:

- **More electrification**
 - **Modernise the tramway**, to attract more passengers back to this clean (at the roadside) mode, and reduce demand for parallel diesel bus services
 - **Implement pilot electric trolley bus operations**, and if successful extend such operations into the crowded urban areas (Citybus tested a trolleybus in its Wong Chuk Hang depot in about 2002)
 - **Implement trial hybrid double-deck bus schemes**, to test efficiency savings and clean operation in crowded urban areas
 - **Implement trial electric vehicle schemes for taxis, light buses, and commercial vehicles** as appropriate vehicles become available
- **Alternative, cleaner and more economical fuels**
 - **Extend the use of LPG to light goods vehicles** on a voluntary basis initially, thereby removing diesel from such operations
 - **Implement trial schemes to use CNG or LNG** on commercial vehicles, including non-franchised buses
 - **Consider for implementation other trial schemes**, as may be proposed from time to time

Address congestion

The time has come to reduce pollution-causing congestion on our most congested roads, namely those on the north shore of Hong Kong Island. Smoother traffic flows reduce congestion and thereby reduce emissions. Electronic road pricing (ERP) is one possible solution to this problem. But before introducing ERP, Government will need to demonstrate that it has done all possible to introduce other measures to meet citizens' transport needs, and to attract citizens to use public transport. A similar approach was adopted in the 1990's with the establishment of a Working Group on Congestion. **We propose** that another high level Working Group on Congestion be established, with members from government and private sector, and with a broad remit to maximise alternative solutions to the problem (e.g. off-road PT (rail, light rail, moving walkways etc), park and ride), as well as further investigating how an ERP scheme might be developed. **We propose** that work on the above be brought forward to Phase I, including electronic road pricing.

Introduce electronic toll charging technology

Traffic stopping and starting to make cash payments at toll plazas pollutes the air, and is energy and space inefficient. **We propose** that compulsory electronic charging should be implemented at toll plazas as a phase I measure. Once implemented, this would reduce the implementation time for ERP, if decided, by 2-3 years, and would reduce the risks associated with introducing the technology and ERP schemes at the same time.

Phase I Measures

- **Emission Control Measures**

Measure 2: Early retirement of aged/heavily polluting vehicles (pre-Euro, Euro I and Euro II vehicles and franchised buses);



Measure 3: Earlier replacement of Euro III commercial diesel vehicles with models meeting latest Euro standards; and

Measure 4: Wider use of hybrid/electric vehicles or other environmentally-friendly vehicles with similar performance (20% private cars and 10% franchised buses)

On measures 2 and 3, we support in principle the proposals to replace pre-Euro and Euro I – III vehicles with Euro V vehicles, but the financial impact on the trades concerned may be very substantial. We support Government's current initiatives to focus on pre-Euro and Euro I vehicles first. In order to make progress, Government will need to consider how to incentivise the owners of all the concerned vehicles to upgrade.

On measure 2, we note the focus on franchised buses. This is appropriate as such buses generally travel in heavily populated areas. **We propose** that Government should provide subsidies to the bus companies, as are provided to other commercial vehicle owners, to complete the replacement of Euro I vehicles within, say, three years (by which time pre-Euro vehicles should have been replaced anyway under the ongoing bus replacement programme).

We propose that solutions for the non-franchised bus fleet, which also operate in heavily populated areas, should also be given special focus.

We propose one additional area to explore could be on board air-flow management for buses. For almost 7-8 months per year the climate is temperate, it may be possible to utilise ambient air for temperature control instead of using air-conditioning.

- **Transport management**

Measure 10: Low emission zones; and

Measure 11: Car-free zone/pedestrian scheme

We support these proposals. Most citizens are pedestrians in their daily lives, yet the pedestrian environment presents many problems. Air quality is often poor, but there are associated issues - the physical environment may be untidy or in poor condition, pedestrians may be squeezed into inadequate space with poor movement and in competition with vehicles or unauthorised land users. We note that Government has developed various visionary schemes to improve the pedestrian environment further. But implementation is foundering because of inadequate accountability, fragmented responsibilities and a failure to address various vested interests. **We propose** that a holistic approach be adopted to **develop world-class pedestrian schemes**.

To this end, **we propose**:

- Designating a **Policy Secretary** to be accountable for improving the pedestrian environment, including ensuring that all concerned Bureaux and Departments share a common vision, work to the same programme and allocate sufficient resources (additional or by redeployment) to this end;
- Developing a revitalised programme to cover:
 - i. **Connectivity**, meaning the ability for pedestrians to move freely along demand lines within and between areas, including through extended provision of hillside escalators, moving walkways etc.



- ii. **Pedestrian Areas**, meaning the improvement of the street environment through the implementation of a range of measures from pavement widening to the introduction of well managed "Pedestrian Priority Zones".
- iii. **Quality**, meaning ensuring that pedestrian facilities are made as attractive and safe as possible, for example by minimising level changes and implementing people-friendly street furniture.

We would be pleased to expand on these views if that would be helpful.

Measure 12: Bus route rationalisation

We support these proposals. However **we propose** that they be developed with care, so as not to reduce the attractiveness of public transport and so as to ensure that any road space freed up is not taken over by private cars or other vehicles. To this end, more ambitious schemes may be needed with investment in infrastructure, to permit bus/bus interchange with the minimum of inconvenience to those affected. Where possible, schemes may offer some form of concessions, for example bus-bus interchange fare concessions and very convenient interchanges. It may be possible to coordinate the reduction of certain bus frequencies with the expansion of clean public transport services.

- **Infrastructure Development and Planning**

Measure 13: Expand rail network

We support these proposals, and note that, for the coming few years, there is an ambitious railway development programme under planning for early implementation.

Measure 14: Cycling network to major transport hubs

We support these proposals. A start may be made in New Towns such as Tin Shui Wai, where reasonable cycling infrastructure already exists, and where many find the cost of internal public transport too high. The cycling environment exhibits various problems – locations of cycle parking facilities may be inappropriate or inadequate; management of the parking facilities is poor; enforcement is patchy; signs for the cyclists are confusing and sometimes misleading and connectivity for cycle trips is fragmented. Users do not know how these facilities should be used safely. A number of Departments are involved in the management of cycling but none has full responsibility - further efforts to prioritise and co-ordinate their efforts may be required. For all these reasons, **we propose** that a holistic approach will be taken.

We propose the following package to foster cycling in the New Towns for internal trips, feeder trips to public transport hubs and leisure trips:

- Designating a **Policy Secretary** to oversee the concerned departments to develop a programme to improve cycling arrangements in the New Towns;
- Strengthening the role of cycling in the New Towns within **the following framework**:
 - i. Improved connectivity, parking, signage and other facilities
 - ii. Better provision and management of parking
 - iii. Improved safety education and training
 - iv. Effective enforcement;

- Implementing the above framework as a **programme** to ensure that any action taken suits the actual situations and needs of each locality, and lessons learned in one area can be transferred to another. Two pilot areas might be Tin Shui Wai and Tseung Kwan O;
 - Consider **contracting out** the management of cycling facilities.
- We would be pleased to expand on these views if that would be helpful.

The Chartered Institute of Logistics and Transport in Hong Kong (CILTHK)

CILTHK is the professional body for those engaged in various sectors of transport and logistics, including air, sea and land, for both passenger and freight movement. The membership is around 1,900.

We hope you will find the above suggestions of interest and worth pursuing. We would appreciate the opportunity to call on you to explain our ideas further.

Yours sincerely,



Ir Prof. Wong Sze-chun
President
The Chartered Institute of Logistics and Transport in Hong Kong

