

## Air Pollution Control (Air Pollutant Emission) (Controlled Vehicles) Regulation

### Civic Exchange's Written Submission to the Subcommittee on Air Pollution Control (Air Pollutant Emission) (Controlled Vehicles) Regulation

21 November 2013

1. To improve roadside air quality and to protect public health, the Government has proposed to phase out pre-Euro IV (i.e. pre-Euro, Euro I to III) diesel commercial vehicles (DCVs) and to limit the service life of newly registered DCVs at 15 years. The Air Pollution Control (Air Pollutant Emission) (Controlled Vehicles) Regulation (the Regulation) was gazetted on 25 October 2013 and tabled in the Legislative Council (the Council) on 30 October 2013.
2. Civic Exchange in principle supports the Regulation based on public health considerations. The regulation to phase out pre-Euro IV DCVs is long overdue. Numerous studies have shown that exhaust from DCVs causes lung cancer in humans<sup>1</sup>, and is associated with increased risk of bladder cancer, cardiorespiratory morbidity and mortality, lower birth rate and other adverse health impacts.<sup>2</sup> Since particulate matter (PM), the carcinogenic part of diesel exhaust, emitted from pre-Euro IV DCVs is four to thirty-four times higher than that from Euro IV and V vehicles, and a majority of Hong Kong population is exposed to DCV exhaust on a daily basis, retiring high-emission DCVs and replacing them with cleaner ones is a critical measure to improve roadside air quality and to protect public health. All Hong Kong residents are paying a heavy price for poor air quality – more than 3,000 premature deaths and HK\$39 billion in monetary losses (or nearly HK\$5,500 for each Hong Kong citizen) are caused by air pollution in 2012.<sup>3</sup> There is no excuse to further delay actions for mitigating air pollution, such as the phasing out of dirty DCVs proposed in this regulation.

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<sup>1</sup> Benbrahim-Tallaa L, Baan RA, Grosse Y, et al, on behalf of the International Agency for Research on Cancer Monograph Working Group (2012) 'Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes', *The Lancet Oncology*, 13(7), pp.663-664.

<sup>2</sup> See for example R. D. Brook (2007) 'Is air pollution a cause of cardiovascular disease? updated review and controversies', *Reviews on Environmental Health*, 22(2), pp.115–137; Pedersen M, Giorgis-Allemand L, Bernard C, et al. (2013). 'Ambient air pollution and low birthweight: a European cohort study (ESCAPE)', *Lancet Respiratory Medicine*, 1(9), pp.695-704.

<sup>3</sup> Ying-kit, Lai (2013) 'Hong Kong air pollution causes 3,000 deaths, causes billions annually', *South China Morning Post*, 15 January 2013. <http://www.scmp.com/news/hong-kong/article/1128685/air-pollution-causes-3000-deaths-costs-hk39b-annually>

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CIVIC EXCHANGE IS A COMPANY WITH LIMITED LIABILITY AND A REGISTERED CHARITY IN HONG KONG

23/F, CHUN WO COMMERCIAL CENTRE, 23-29 WING WO STREET, CENTRAL, HONG KONG.

香港中環永和街23-29號俊和商業中心23樓

TEL 電話：(852) 2893 0213 FAX 傳真：(852) 3105 9713

3. In particular, Civic Exchange wants to emphasise that the revised DCV retirement schedule which extends the retirement of Euro I to III DCVs by one year is far from ideal, as such an extension will reduce health benefits to people achieved through the Regulation. While we understand that such amendment was made to lessen the financial hardship of the vehicle owners, people in Hong Kong will be exposed to air pollutants emitted from these old DCVs for a longer period of time. Given the adverse health effects of diesel exhaust, there are no grounds to allow for a further extension to the retirement schedule.
4. Even though Euro V DCVs (or Euro VI, which may become available at the date of the commencement of the Regulation) should be cleaner than pre-Euro IV DCVs, the amount of diesel particulate matter (which is determined by the WHO as carcinogenic<sup>4</sup>) and ozone-forming nitrogen oxide would increase over time as the performance of emissions control components gradually deteriorates even with proper maintenance. Unless the government puts in place a reasonably strict in-use emissions standard for DCVs, a fixed phase-out schedule of 15 years as proposed is a reasonable way to ensure that DCVs will be replaced with even cleaner vehicles over time.
5. In view of the above, Civic Exchange urges the honourable members of the Council to pass the Regulation without any delay, in order to protect the health of people in Hong Kong.

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<sup>4</sup> World Health Organization (2012) 'IARC: diesel engine exhaust carcinogenic', Press Release, 12 June 2012. [http://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213\\_E.pdf](http://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213_E.pdf).