



## **The American Chamber of Commerce in Hong Kong**

### **Response to the Proposal to Review Air Quality Objectives**

The American Chamber of Commerce in Hong Kong (AmCham HK) fully supports the proposal of further tightening the Air Quality Objectives (AQOs) in Hong Kong with reference to the World Health Organisation's Global Air Quality Guidelines. Continuous improvement of air quality is crucial for the health and wellbeing of residents and positioning of Hong Kong as a livable city for international talents.

We would also like to offer our views for improving the air quality in Hong Kong for consideration by the Government –

- Enhancement of energy efficiency in Hong Kong could achieve quick return in reducing fossil fuel consumption for power generation. While we observe the energy conservation awareness in Hong Kong has been improved in general, inefficient use of energy, in particular excessive space cooling and uncontrolled outpour of cooled air to street, is still relatively common in Hong Kong. In some cities, shopping mall and office indoor temperatures are mandated at above 26 °C or even 28 °C with adequate ventilation to save energy, and office workers would dress down accordingly. Hong Kong should not continue to stay at the previously defined voluntary guideline at 25.5 °C and encouraging a more energy efficient indoor temperature requirement for shopping malls and office spaces should be pursued.
- It is also noted that computing in the cloud is five times more energy efficient than on-premises data centers due to a higher utilization rate and the highly energy-efficient power and cooling systems of cloud-based data centers.
- While fossil fuel passenger vehicles in Hong Kong are being progressively replaced with electric vehicles, electrification of commercial vehicles is just at the small scale pilot stage, and a development roadmap may only be announced in 2025. Given commercial vehicles generate the majority of the roadside pollution and the relevant electric vehicle technologies are largely already commercially available, Hong Kong Government should engage relevant stakeholders as soon as possible to finalise the transition roadmap in order to ensure a smooth transition. Development of the associated infrastructure and EV supporting facilities would also provide business and employment opportunities for Hong Kong.
- To effectively tackle nitrogen oxides emissions and ozone, relevant measures should also be explored for the maritime sector. Hong Kong does not have onshore power supply provisions for ocean going vessels, which burn fossil fuel at berth and create local emissions and this needs to be addressed with strong policy support for shore to ship power supplies. The Government should also review the latest international practices and assess if the emission requirements of local ferries and ocean going vessels in Hong Kong

waters should be further tightened. Besides, a concrete timeline should also be developed for phasing out local fossil fuel ferries.

- Hong Kong's Climate Action Plan 2050 defines a requirement for the power sector to adopt 60-70% zero-carbon energy and phase out coal for daily power generation by 2035, which is 12 years from now. Interim targets should be considered so that the use of coal, which is more emission intensive, would be reduced as soon as practicable, and the ratio of zero-carbon energy should also be progressively grown. That could bring further near term improvement to air quality.
- Significant progress in reducing local air pollution in Hong Kong has been made in recent years due to efforts from both government and the wider community. Government should do more public education to highlight the changes made, the latest pollution levels and to help encourage further behavioural change by the public.