

The Conservancy Association's Comments on the Consultation Paper on Managing Indoor Air Quality December 1999

The Conservancy Association welcomes the Government initiative to managing indoor air quality. In the short to medium term, the Association is in full support of the objective - "for office buildings and public places, building owners and management of these buildings as well as employers should endeavor to achieve at least Level 2 of the Indoor Air Quality Objectives as their desired target." The level 2 objective represents the indoor air quality that provides protection to the public at large including the young and the aged. In the long term (say 10 years), the level 1 objective should be reached, which represents a very good indoor air quality that a high class and comfortable building should have.

In the short term (within the next three years), the Association does not object to a self regulation approach as long as the certification system is mandatory, regularly updated, transparent and well publicised. The Government needs monitor the certification.

The certification should be mandatory so that all buildings and public places in Hong Kong are required to indicate the indoor air quality of their premises. This will keep the owners informed of how good or bad their premises are. More importantly, it will inform the tenants and the users of the environment they live in and the risk they are taking. With the short duration of the tenancy in Hong Kong, they may exercise their consumer rights and choose other buildings with better grades. This will also drive the owners and buildings manager to maintain good air quality within their buildings.

It is also important for the certification system to be regularly updated, at least on quarterly basis. This will ensure that the owners and buildings management will work to maintain the air quality within their building.

The certification system should also be transparent and the full details of each types of indoor air pollutants should be made known. In addition, the laboratory employed, the sampling method, testing methods, equipment calibration methods (if appropriate) should be part of the certificate system.

All information from the certification process and the results of the assessment should be well publicised and made available to the public (for public places) and to (potential) tenants (for offices). This will not just ensure that the public and the tenants are aware of the indoor air quality of particular premises but drive the owners and building management to maintain a good air quality within their buildings.

In the medium term (3-5 years), the Association urges the Government to develop an Indoor Air Quality Regulation and adopt the Level 2 Objective as the minimum indoor air quality standard which all buildings and public places in Hong Kong must attain. Since it would take time to prepare these regulations, the Association urges the Government to commence the drafting of these regulations immediately so that in about 3-5 years time, the regulations will be in place. This will and should allow time for public discussion on whether the Level 2 objectives are sufficient, based on the experience self regulation and certification system. Also, in the medium term, regulations to ban smoking in all office buildings and public places should be put in place and enforced.

The Association urges the government to be more innovative and put more resources in public education and publicity campaign, in addition to the pamphlets and radio voiceover and information centre. The education and publicity programmes should be consistent, systematic, regular, in depth as well as reaching out to wide audience group, covering all sectors and all ages as well as specific to each groups. Local groups will be made use of, as well as schools, associations of different professions and work.