

HUMAN RIGHTS-BASED CLEAN AIR MANAGEMENT TOOLKIT FOR BANGKOK

*SELF-ASSESSMENT FRAMEWORK FOR THE BANGKOK
METROPOLITAN ADMINISTRATION (BMA)*

Authors

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For the Raoul Wallenberg Institute of Human Rights
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About RWI

The Raoul Wallenberg Institute of Human Rights and Humanitarian Law (RWI) is an independent academic institution founded in 1984 at Lund University, Sweden. RWI's mission is to promote universal respect for human rights and humanitarian law through research, academic education, and institutional capacity development.

The RWI Asia and the Pacific Office, based in Jakarta, Indonesia, serves as the regional hub coordinating regional programmes and peer-to-peer professional exchanges across the region.

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List of Abbreviations

AOB	: Austrian Ombudsman Board
AQHI	: Air Quality Health Index
ASEAN	: Association of Southeast Asian Nations
BMA	: Bangkok Metropolitan Administration
CCESD	: Climate Change and Environmental Sustainability Department
CSO	: Civil Society Organizations
DSI	: Department of Special Investigation
ETS	: Emissions Trading Systems
EV	: Electric Vehicle
FNF	: Friedrich Naumann Foundation
HRBA	: Human Rights-Based Approach
HRC	: Human Rights City
KPI	: Key Performance Indicators
LEZ	: Low Emission Zone
LGBTQ	: Lesbian, Gay, Bisexual, Transgender, and Queer
MRT	: Mass Rapid Transit
NECA	: Enhancement and Conservation of National Environmental Quality Act
NHRCT	: National Human Rights Commission of Thailand
OGD	: Open Government Data
OGP	: Open Government Partnership

OGP	: Open Government Partnership
OHCHR	: Office of the United Nations High Commissioner for Human Rights
PCD	: Pollution Control Department
PM 2.5	: Particulate Matter smaller than 2.5 microns
PCQC	: People's Council of Quezon City
PWD	: Persons with Disabilities
RWI	: Raoul Wallenberg Institute of Human Rights and Humanitarian Law
SDG	: Sustainable Development Goals
UCLG	: United Cities and Local Governments
UDHR	: Universal Declaration of Human Rights
WHO	: World Health Organization

Executive Summary

On 28 August 2025, the Bangkok Metropolitan Administration (BMA) declared its commitment to become a Bangkok Human Rights City under the vision of "A Livable City for All." This commitment signals a shift from a needs-based approach to public service delivery toward a human rights-based approach (HRBA), where residents are recognized as rights-holders and public authorities as duty-bearers responsible for respecting, protecting, and fulfilling those rights. Within this context, clean air is not merely an environmental objective but a prerequisite for realizing the rights to health, life, and a healthy environment.

This report assesses BMA's readiness to operationalize a human rights-based approach to air quality governance. It draws on three complementary analyses: (i) a review of Thailand's legal and policy framework for air quality management; (ii) an institutional assessment of BMA's governance capacity; and (iii) a comparative review of four cities that have advanced Human Rights City initiatives. Based on these findings, the report presents a Self-Assessment Toolkit and a phased implementation roadmap to help translate BMA's Human Rights City commitment into institutional practice.

Thailand's legal framework provides BMA with a foundation to address air quality but remains fragmented and largely administrative in nature. Existing legislation does not explicitly recognize a right to clean air, and BMA's authority is constrained by Thailand's centralized governance system, limiting its ability to regulate major pollution sources beyond its jurisdiction. The proposed Clean Air Act could strengthen this foundation by formally recognizing the right to clean air, although it remains under parliamentary consideration.

BMA has already implemented numerous innovative measures to improve air quality, including expanded air quality monitoring, pollution source identification, cleaner vehicle initiatives, and dust-free classrooms. However, these initiatives remain dispersed across departments and policy instruments rather than being embedded within a coherent human rights framework. As a result, they remain vulnerable to changes in political priorities and institutional leadership.

Comparative experience from Vienna, Lund, Gwangju, and Quezon City demonstrates that successful Human Rights Cities move beyond political declarations by embedding human rights into local legislation, establishing dedicated institutional mechanisms, and creating meaningful and sustained public participation processes. These lessons provide practical guidance for strengthening Bangkok's own institutional architecture.

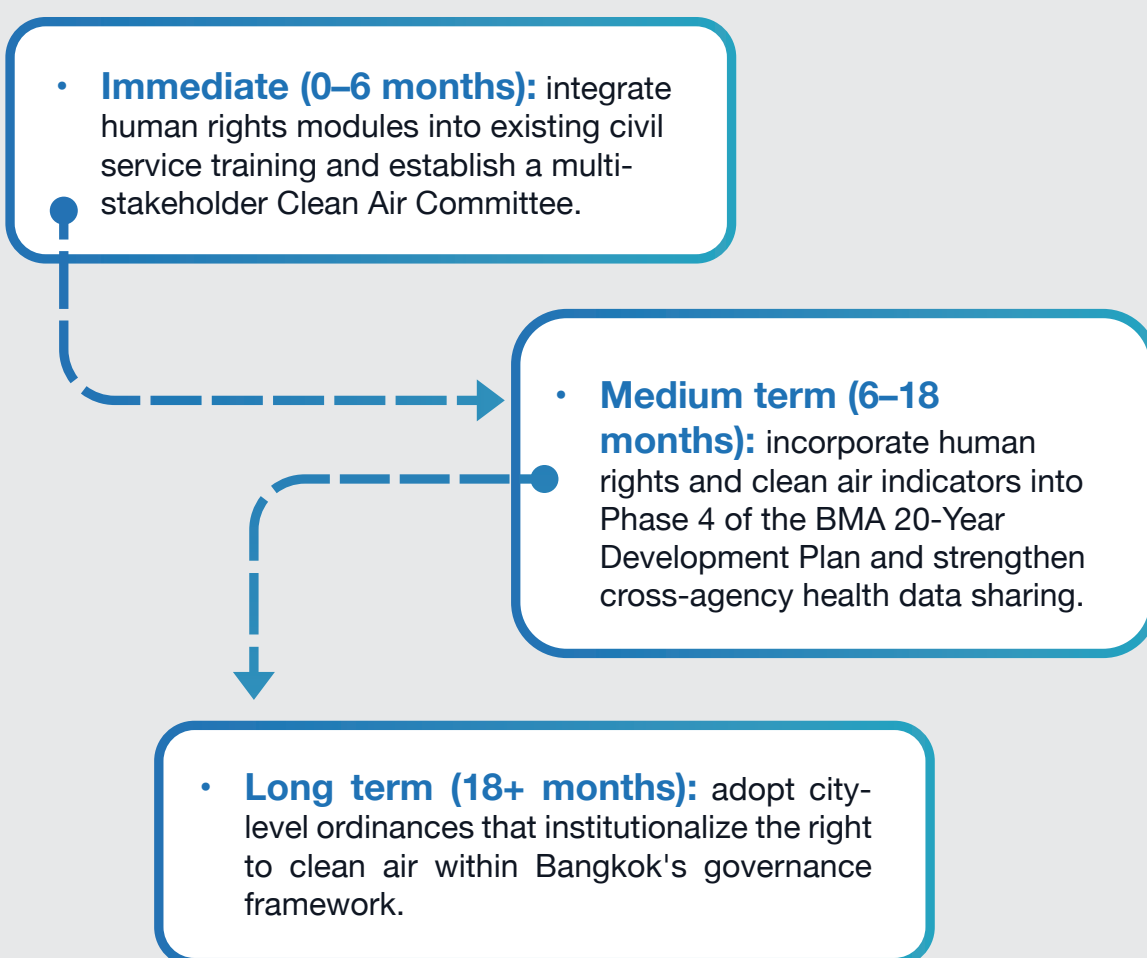
KEY FINDINGS

Self-Assessment Toolkit

To support implementation, the report introduces a practical Self-Assessment Toolkit for Human Rights-Based Clean Air Governance. The toolkit synthesizes international and national frameworks into a practical scorecard comprising 25 assessment questions across four thematic areas. It enables BMA departments to evaluate existing policies, identify institutional gaps, monitor progress over time, and prioritize reforms needed to strengthen rights-based air quality governance.

Implementation Roadmap (Annex A)

Recognizing that assessment alone does not lead to institutional change, the report proposes a phased roadmap comprising five priority actions:



Together, these recommendations provide a practical pathway for embedding human rights principles into municipal air quality governance. By institutionalizing existing good practices, strengthening accountability, and promoting meaningful public participation, BMA can move from a policy commitment toward a durable model of rights-based urban governance that supports cleaner air and a healthier, more inclusive city for all.

PART 1:

Bangkok as a Human Rights City



Photo source: pexels/Farah Sayyed

1.1 Conceptualizing Human Rights City

What is a Human Rights City?

A Human Rights City is a city, municipality, or local government that adopts international human rights standards as the guiding framework for urban governance. Rather than viewing public services as discretionary welfare or responses to need, it recognizes residents as rights-holders entitled to equal treatment, participation, and accountability, while local authorities assume the role of duty-bearers responsible for respecting, protecting, and fulfilling those rights within their legal mandate.

The Human Rights City model extends beyond compliance with national legislation. It is an ongoing governance process in which local governments, civil society, the private sector, and communities work together to embed human rights principles into policies, institutions, and everyday decision-making, with the objective of improving quality of life for all residents.¹

Why Local Governments Matter

Although states remain the primary duty-bearers under international human rights law, local governments play a critical role in implementation because they are the level of government closest to people's daily lives. Municipal decisions directly influence access to housing, health, transport, education, public spaces, and environmental quality. Local governments are also best positioned to respond to the complex social and environmental challenges created by rapid urbanization, while translating national commitments and international human rights standards into concrete local action.

From Needs-Based to Rights-Based Governance

The transition to a Human Rights City requires a fundamental shift in governance. Residents are no longer regarded as beneficiaries of government assistance but as rights-holders whose entitlements must be respected without discrimination. Correspondingly, municipalities move from being discretionary service providers to duty-bearers accountable for delivering services in accordance with human rights principles.

This transformation also changes the role of public participation. Rather than treating consultation as a tool to improve policy outcomes, participation becomes a right in itself, requiring transparent decision-making, inclusive engagement, and effective accountability mechanisms.

¹ Raoul Wallenberg Institute of Human Rights and Humanitarian Law, *Human Rights Cities Indicators* (Lund: RWI, 2021), accessed August 1, 2026, <https://rwi.lu.se/wp-content/uploads/2021/06/HUMAN-RIGHTS-CITIES-INDICATORS.pdf>

Operationalizing a Human Rights City

The Human Rights City model translates international human rights principles into practical local governance through a process often referred to as localizing human rights. According to the OHCHR–UCLG Guidance Framework², creating a Human Rights City requires action across three key areas:

- ▶ Political and legal foundations through local charters, ordinances, or formal declarations of commitment.
- ▶ Institutional structures such as dedicated human rights offices, committees, ombudsman mechanisms, or permanent commissions.
- ▶ Operational tools that establish accountability, participation, monitoring, and strategic planning, supported by adequate financial and human resources.

Together, these elements help embed human rights within municipal planning, budgeting, policymaking, implementation, and service delivery, moving human rights commitments from formal recognition towards sustained institutional practice and accountability.

Implementing a Human Rights City is not without challenges. In many Asia-Pacific countries, local governments operate within highly centralized governance systems where national legislation limits municipal authority. As a result, cities may lack legal powers over issues such as air quality regulation or environmental enforcement, even when these significantly affect residents' rights. Municipalities also frequently face constraints in funding, technical expertise, institutional capacity, and human resources. Consequently, successful implementation depends not only on political commitment but also on creating an enabling local environment where policies, institutions, and stakeholders are aligned to integrate human rights into everyday governance.

1.2. Applying the Framework: Bangkok's Transition to a Human Rights City

When evaluated against the OHCHR-UCLG tripartite governance framework, the recent trajectory of the BMA serves as a clear case study of a municipality attempting to become a Human Rights City. Bangkok's approach demonstrates how a major Asian metropolis moves systematically down the path of localizing human rights by aligning its municipal strategy with the required political foundations, specialized institutional structures, and localized operational tools.

² United Cities and Local Governments (UCLG) and Office of the United Nations High Commissioner for Human Rights (OHCHR), *Guidance Framework for Creating a Human Rights City* (Barcelona: UCLG Committee on Social Inclusion, Participatory Democracy and Human Rights, 2025), accessed August 1, 2026, https://www.uclg-cisdg.org/sites/default/files/documents/files/2025-07/guidance-framework_0715.pdf

The foundational baseline for this transition was established on 28 August 2025, when Bangkok officially declared its intent to transform into a Bangkok Human Rights City under the vision of “A Livable City for All.”³ This declaration marks a significant institutional turning point, signaling the political intent required to rework the city’s entire management system with the ultimate goal of building an urban environment that respects human dignity.

To translate this foundational declaration into actual practice, the BMA relies on its existing “9 Guiding Policies, 9 Good Strategies” strategic framework. This framework serves as a vital tool for embedding human rights into the city’s development direction and addressing micro-level issues (capillaries or ปัญหาเส้นเลือดฝอย)⁴. This drive is reflected in the implementation of Zero-Based Budgeting, which allocates resources by prioritizing rights protection systematically. According to data from Bangkok’s Universal Declaration of Human Rights (UDHR) monitoring system, Good Commuting received the highest budget allocation, indicating a strong emphasis on the right to mobility and access to public spaces, followed by Good Management, Good Health, Good Safety, and Good Environment. All of these areas closely align with international standards of human rights protection.⁵

In the dimension of physical accessibility and the right to the city, the BMA has promoted universal design to dismantle physical barriers and restore rights to all demographic groups, particularly vulnerable populations, persons with disabilities, and the elderly. The city has established a strategic goal to develop 1,000 kilometres of high-quality pavements, with over 774 kilometres already completed across 87 main routes⁶. These pavements focus on level surfaces, remaining free of obstacles, and incorporating standard ramps. Alongside this initiative, the BMA is constructing covered walkways at public transport interchange points and pushing for the installation of MRT Blue Line lifts on all sides of every station to reduce inequality in rail system access.⁷

Regarding the protection of rights to health, diversity, and social welfare, Bangkok has moved beyond basic rights to recognize diverse identities. This is demonstrated by the launch of the “BKK Pride Clinic”, which provides healthcare and counselling services to the LGBTQ+ community without stigmatization.⁸ In addition, the BMA has fostered an environment that accepts differences through a policy allowing civil servants and staff to dress according to their gender identity.⁹ In terms of the right to food, the “BKK Food Bank” project has been initiated across all 50 districts to

³ Bangkok Metropolitan Administration, “BMA Declares Intent to Transform the Capital into a Human Rights City under the Vision ‘A Livable City for All,’” Bangkok Metropolitan Administration Public Relations Department, August 28, 2025, accessed July 1, 2026, <https://pr-bangkok.com/?p=518392>

⁴ This is a specific policy term utilized by the BMA led by Governor Chadchart Sittipunt.

⁵ Bangkok Metropolitan Administration, Strategy and Evaluation Department, “Bangkok Human Rights City Monitoring System” [กรุงเทพมหานคร เมืองสิทธิมนุษยชน], accessed July 1, 2026, <https://dp.bangkok.go.th/udhr/frontend/web/>.

⁶ “Bangkok’s Pedestrian Revolution: New Sidewalk Standards Advance, Over 700 Kilometres Completed,” *Nation Thailand* (Bangkok), March 21, 2025, accessed July 1, 2026, <https://www.nationthailand.com/thailand/bangkok/40047694>.

⁷ “City Hall Expands Project to Renovate Walkways,” *Bangkok Post* (Bangkok), March 21, 2025, accessed July 1, 2026, <https://www.bangkokpost.com/thailand/general/2984601/city-hall-expands-project-to-renovate-walkways>.

⁸ “City Hall Dress Code Supports Gender Identity,” *Bangkok Post*, July 1, 2025, accessed July 1, 2026, <https://www.bangkokpost.com/thailand/general/3061445/city-hall-dress-code-supports-gender-identity>.

⁹ Ibid.

manage surplus food and distribute it to vulnerable groups, low-income earners, and the homeless.¹⁰ Moreover, the BMA has collaborated with the Department of Special Investigation (DSI) and related agencies to assess the status of and assist stateless and undocumented individuals in restoring civil registration rights, which serve as the essential first step toward accessing other state welfare benefits.¹¹

The driving of governance through digital democracy via the “Traffy Fondue” platform is a key innovation that connects state power with the public. This platform serves as a tool to restore rights to citizens, allowing them to report any issues directly, reducing bureaucratic red tape, and increasing accountability of local authorities. Furthermore, the big data generated from these complaints enables the BMA to analyze issues and allocate budgets to target areas with high precision. The success of this mechanism has also served as a model for the Ministry of Education to expand the concept into a Rights Protection Centre to handle safety complaints in educational institutions.¹²

The BMA utilizes strategic partnerships to bridge the gap between high-level human rights principles and daily municipal operations. These collaborations provide the technical support necessary to ensure city services meet international standards. RWI, the Friedrich Naumann Foundation (FNF Thailand), and the National Human Rights Commission of Thailand (NHRCT) have provided a range of academic and technical support to the BMA, as well as connected Bangkok’s strategy to the successful experiences of established Human Rights Cities in Europe and Gwangju.

On a practical level, the city has integrated the National Human Rights Plan with the Department of Rights and Liberties Protection to establish localized dispute mediation mechanisms, which serve to reduce violations directly within communities. Beyond domestic implementation, Bangkok has demonstrated regional leadership by co-hosting the high-level conference “Human Rights Cities in ASEAN: Localizing Human Rights for Inclusive Development”.¹³ This positioning reflects that Bangkok is not only adopting the framework within its own jurisdiction but is also serving as a strategic leader in driving the “localization of rights” across the Southeast Asian region.

In May 2026, the Governor of Bangkok chaired the First Meeting of the Committee for Driving the Strategic Development of Bangkok as a Human Rights City.¹⁴ During this meeting, the committee approved a 6-to-12-month urgent action plan for the systematic translation of human rights principles into practice. This action plan establishes a three-pronged framework:

¹⁰ Bangkok Metropolitan Administration, “BKK Food Bank,” Greener Bangkok, accessed August 1, 2026, <https://greener.bangkok.go.th/en/bkk-food-bank/>.

¹¹ “Govt to Register 1m Stateless Individuals ‘Within Two Years,’” *Bangkok Post*, March 11, 2025, accessed August 1, 2026, <https://www.bangkokpost.com/thailand/politics/2977041/govt-to-register-1m-stateless-individuals-within-two-years>.

¹² “Impact of Information Technology on Urban Management Efficiency: A Case Study of the Traffy Fondue in Bangkok,” *Urban and Regional Planning Review* 12 (2025), accessed August 1, 2026, https://www.jstage.jst.go.jp/article/urpr/12/0/12_298/article.

¹³ ASEAN Secretariat, “ASEAN Forum in Bangkok Charts Path for Human Rights-Based Cities Across the Region,” ASEAN News, April 28, 2026, accessed July 1, 2026, <https://asean.org/asean-forum-in-bangkok-charts-path-for-human-rights-based-cities-across-the-region/>.

¹⁴ “BMA Approves Urgent Action Plan to Move Bangkok Towards a ‘Human Rights City’ for All,” *The Standard* (Bangkok), May 6, 2026, accessed July 1, 2026, <https://thestandard.co/chadchart-bangkok-human-rights-plan/>.

1. Declaration of a public administration and service delivery policy centred on human rights principles; this officially shifts the framework of public service delivery from a state-welfare approach to a rights-based approach.
2. The development of Human Rights Guidelines for BMA officials aims to transform abstract principles into clear and accountable practices at the implementation level.
3. Integrate the SoSafe system with Traffy Fondue to improve the effectiveness of rights protection in the social dimension and establish an accountability mechanism that directly connects citizens with state agencies.

Nevertheless, this transition process continues to face limitations, challenges, and uncertain future directions. At the structural level, the Bangkok Metropolitan Administration (BMA), as a special form of local government, remains under pressure from the context of national political dynamics and budgetary uncertainties imposed by the central government. Additionally, the city faces challenges from emerging rights issues. These include the environmental crisis, such as the PM2.5 pollution problem, which directly violates the right to health and requires a systemic management mechanism to resolve. For this reason, in order to ensure long-term sustainability, Bangkok should consider elevating this declaration of intent into a “City Charter for Human Rights” with legally binding local ordinances. Such a charter would demonstrate that local authorities can serve as a crucial force in promoting and protecting human rights.

1.3. Bangkok as a Human Rights City in the Context of Clean Air Management

Bangkok’s Human Rights City approach provides a framework for considering urban governance through a human rights lens, including in relation to environmental issues such as air pollution. This approach is relevant to clean air management because air pollution can affect the enjoyment of rights, including the rights to health, life, and a clean, healthy, and sustainable environment. The Human Rights City framework therefore provides an opportunity to examine how human rights considerations can be reflected in Bangkok’s policies, institutions, and approaches to addressing air pollution, including through participation, accountability, and access to information.

Within this framework, existing Bangkok Metropolitan Administration (BMA) initiatives can be examined not only in terms of their environmental objectives, but also in terms of their potential contribution to the protection and realization of rights. These include the use of data-driven management, spatial approaches to urban policy, and budgeting mechanisms intended to allocate resources to identify local priorities.

Urban development in the dimension of a good environment has been translated into practical mechanisms that are linked to Zero-Based Budgeting, the development of

spatial-based policies, and the concrete application of Data-driven Management.¹⁵ A significant development has been the shift from a reactive approach to proactive management through the “Dust Detective” (นักสืบฝุ่น) policy, which applies scientific analysis to identify sources of pollution. This operates alongside the expansion of a monitoring network featuring over 1,000 low-cost sensors and real-time data disclosure, thereby restoring the right to information and enabling citizens to protect themselves timeously.¹⁶

At the structural level, the city has sought to actualize rights through spatial-based measures. These include the development of the “BKK Clean Air Area” project, which integrates both open and enclosed spaces. Initiatives involve planting one million trees to create natural barriers, installing air purifiers in schools and hospitals for vulnerable groups, and managing pollution sources through Low Emission Zone measures, smoky vehicle controls, and the promotion of an EV ecosystem.¹⁷

From a human rights perspective, however, the relevance of these measures extends beyond their technical or environmental functions. Clean air management also raises questions of equality, participation, access to information, and the protection of groups that may experience greater exposure or greater health consequences from air pollution. A Human Rights City approach therefore provides a basis for examining not only whether pollution levels are reduced, but also how the benefits and burdens of air-quality policies are distributed across different communities and population groups.

This is particularly relevant because exposure to air pollution is not necessarily distributed equally across an urban population. Groups that spend substantial time outdoors, live or work in areas with high traffic or other pollution sources, or are more vulnerable to the health effects of air pollution may face particular risks. The human rights lens therefore encourages attention to the distribution of environmental burdens and to whether affected communities have meaningful opportunities to access information, participate in decision-making, and seek remedies where their rights are affected.

This spatial polarization underscores that the clean air crisis is fundamentally a matter of social justice rather than an isolated environmental challenge. The crisis is deeply embedded within the city’s unequal socio-economic architecture. Consequently, clean air management under a Human Rights City framework must look beyond macro-level emissions reductions to concurrently dismantle pollution burden inequality. Shifting from a generic environmental metric to an equity-driven approach ensures that the right to clean air transforms from an abstract principle into a tangible, accessible entitlement for all urban residents, irrespective of their geographic location or socio-economic standing.

¹⁵ Bangkok Metropolitan Administration, “Zero-Based Budgeting” [จัดทำงบประมาณแบบฐานศูนย์ (Zero-Based Budgeting)], Bangkok Open Policy, accessed August 1, 2026, <https://openpolicy.bangkok.go.th/policy/111>.

¹⁶ Bangkok Metropolitan Administration, “Dust Detective Project” [โครงการนักสืบฝุ่น], Greener Bangkok, accessed August 1, 2026, <https://greener.bangkok.go.th/en/pm2-5/dust-detective/>.

¹⁷ Bangkok Metropolitan Administration, “BKK Clean Air Area Project” [โครงการ BKK Clean Air Area], Greener Bangkok, accessed August 1, 2026, <https://greener.bangkok.go.th/pm2-5/bkk-clean-air-area/>.

A significant structural limitation in driving a Human Rights City in the clean air dimension is that the BMA, as a special form of local government, possesses limited authority to manage several primary sources of pollution.¹⁸ These include pollution associated with agricultural and forest burning in neighboring provinces, industrial pollution regulated by central government ministries, and transboundary haze that requires international diplomatic mechanisms. This creates a potential gap between the responsibilities that may be expected of a Human Rights City and the legal and institutional powers available to the BMA. Addressing this gap requires effective mechanisms of vertical coordination between the BMA and relevant national authorities, particularly where the causes and impacts of air pollution extend beyond municipal boundaries.

The proposed Clean Air Act may therefore be significant in establishing a clearer framework for coordination, responsibilities, access to information, public participation, and accountability across different levels of government. Its significance for a Human Rights City approach would depend, however, on the extent to which these principles and mechanisms are reflected in the final legal and institutional framework.

The intersection of the Human Rights City approach and clean air management can thus provide a useful framework for examining how environmental governance translates human rights principles into local policy and practice. Rather than treating clean air solely as a matter of emissions control, this approach draws attention to the distribution of environmental burdens, access to information and participation, institutional accountability, and the respective responsibilities of local and national authorities. A proposed City Charter for Human Rights could potentially strengthen this framework by providing a local statement of rights and responsibilities, including in relation to environmental rights. Any proposal to recognise a right to clean air as a legally enforceable right, however, would require careful consideration of its legal basis, scope, institutional responsibilities, and relationship with national legislation.

¹⁸ Bangkok Metropolitan Administration Act, B.E. 2528 (1985), sec. 89, Royal Thai Government Gazette, vol. 102, part 115 (December 31, 1985): 1–35.

PART 2:

Laws, Policies, Strategies, Plans, and Measures in Clean Air Management in Bangkok



2.1. Legal and Regulatory Frameworks Related to the Clean Air Management of Bangkok

The management of particulate matter (PM_{2.5}) air pollution in Bangkok, as well as the overall management at the national level, is executed under the authority of multiple relevant legislations. These include the Enhancement and Conservation of National Environmental Quality Act, B.E. 2535 (1992)¹⁹, the Disaster Prevention and Mitigation Act, B.E. 2550 (2007)²⁰, and the Public Health Act, B.E. 2535 (1992).²¹ Notably, these instruments are primarily administrative and regulatory in character — designed to control pollution sources, manage disaster response, and safeguard public health — rather than to establish an explicit legal right to clean air. This gap is expected to be addressed, at least in part, by the proposed Clean Air Act.²² However, at the time of the writing of this report (August 2026), the bill remains subject to legislative revision; the scope and strength of this recognition may change before enactment. At the same time, to ensure that governance can effectively regulate and control pollution at source, several co-enforced laws are applied to control and eliminate pollution emissions. These relevant legislations can be categorised into three groups as follows:

Constitutional and Statutory Foundations of BMA's Authority

Before turning to the sector-specific statutes that govern air quality management, it is necessary to establish the constitutional and administrative basis on which BMA's authority as a local government rests. The Constitution of the Kingdom of Thailand, B.E. 2560 (2017)²³ provides a clear, multi-layered foundation for municipal environmental action. Section 76 requires the state to develop public administration and cooperate with relevant agencies to deliver public services for the welfare of the people. Section 250 confers on local authorities the duty and power to care for and deliver public services and public activities for the benefit of local residents, consistent with the principles of sustainable development. Section 55 further imposes on the state an affirmative duty to provide efficient and universal public health services, covering health promotion, disease prevention, and control. Read together, these provisions establish that clean air management is not a discretionary undertaking on BMA's part, but a matter connected to constitutional obligation.

This constitutional mandate is operationalized through the Bangkok Metropolitan Administration Act, B.E. 2528 (1985)²⁴, the constitutive statute that establishes Bangkok as a special-form local authority and defines the scope of its institutional structure, legislative power, and permissible services.

¹⁹ Enhancement and Conservation of National Environmental Quality Act B.E. 2535 (NECA 1992).

²⁰ Disaster Prevention and Mitigation Act B.E. 2550 (2007).

²¹ Public Health Act B.E. 2535 (1992).

²² Thailand. *Draft Act to Regulate the Integrated Management of Clean Air for Health B.E.* draft bill under parliamentary consideration).

²³ Constitution of the Kingdom of Thailand, B.E. 2560 (2017), Royal Thai Government Gazette, Vol. 134, Part 40 A, pp. 1–90.

²⁴ Bangkok Metropolitan Administration Act, B.E. 2528 (1985), Royal Thai Government Gazette, Vol. 102, Part 115, pp. 1–35.

A key structural question in BMA's legislative capacity concerns the source of its ordinance-making power. Section 97 establishes the Bangkok Ordinance as BMA's primary legislative instrument, however, such power rests on several distinct legal bases, each with different implications for the scope of BMA's regulatory authority. Ordinances may be enacted to perform duties assigned directly under Section 89 of the BMA Act, to govern BMA's commercial operations, or to regulate matters relating to finance, budgeting, property, employment, and procurement. Importantly, however, BMA's ordinance-making power is not derived exclusively from the BMA Act itself: Section 97 also permits BMA to enact ordinances “pursuant to authority conferred by other law.” Where another national statute confers a relevant regulatory power on BMA or on local authorities, this provision provides a mechanism through which that authority may be given effect through a Bangkok Ordinance, subject to the scope and conditions of the enabling legislation.

This is significant for air quality regulation because BMA's legislative authority cannot necessarily be assessed by reference to the BMA Act alone. Other national legislation — including laws concerning public health, environmental protection, or local administration — may provide additional legal bases for municipal action where they confer relevant powers on BMA or local authorities. Section 97 therefore operates as a legal bridge between the BMA Act and powers conferred under other legislation: rather than treating BMA's regulatory authority as exhausted by the powers expressly enumerated in the BMA Act, it requires consideration of the broader statutory framework governing local government action. From a rights-based perspective, this is important because the legal basis for BMA's responsibility to address air pollution may emerge not from a single statutory provision, but from the interaction between the BMA Act and other national legislation concerning public health, environmental protection, and local governance.

Two structural features of this framework are particularly relevant to a rights-based reading of BMA's air quality mandate.



First, BMA's authority under the Act is constitutionally grounded but fiscally constrained and this gap matters precisely because a rights-based mandate is only as strong as the resources available to fulfill it: Bangkok's revenue base remains structurally dependent on central government allocation, and statutory caps on locally-collected surcharges (for example, a 10 satang per litre ceiling on the fuel surcharge) leave BMA without meaningful capacity to design its own economic instruments for pollution control, even where the constitutional duty to protect public health is clear. The result is a structural mismatch: BMA holds a constitutional duty to protect public health but lacks the fiscal autonomy to fulfil that duty with proportionate, self-directed regulatory tools. A right to clean air that cannot be resourced locally risks remaining declaratory rather than enforceable.



Second, Sections 93 through 96 of the BMA Act provide underused legal pathways for addressing air pollution's transboundary character. This is an important gap because a rights-based duty to protect public health cannot be effectively discharged if protective action is confined to administrative boundaries that pollution itself does not respect. These provisions permit extraterritorial operations with the consent of neighbouring provincial governors, joint ventures with the private sector, and partnerships with other public authorities. If utilised more fully, they could provide a legal basis for the BMA to coordinate air quality management across provincial boundaries, bringing the geographic scope of public action closer to the actual scale of the harm and, in turn, strengthening the fulfilment of its duty to protect public health.

2.1.1. Group 1: Laws granting governance authority to mitigate particulate matter (PM2.5) air pollution in the Bangkok area

A. The Enhancement and Conservation of National Environmental Quality Act, B.E. 2535 (1992)²⁵

This Act establishes comprehensive provisions for air quality management aimed at preventing and addressing pollution crises resulting from environmental degradation or contamination. It lays down governance mechanisms through legal, administrative, and economic instruments, implemented via an Environmental Quality Management Plan covering both air quality management and source-based pollution control. The Act empowers the National Environment Board to prescribe ambient air quality standards and establishes emission standards regulating pollution discharge at the source — for example, vehicles must not emit pollution exceeding prescribed limits, and owners of controlled pollution sources are legally obligated to install treatment systems to keep emissions within standard limits.

Key definitions (Section 4)

Term	Definition
Environmental Quality Standards	Standard values of water, air, noise, and other environmental conditions prescribed as general criteria for environmental enhancement and conservation.
Pollution	Waste, hazardous substances, and other pollutants — including residues and remains — discharged from pollution sources or naturally present, causing or capable of causing harm to environmental quality or public health. Includes radiation, heat, light, noise, odour, and vibration.

²⁵ NECA 1992.

Term	Definition
Pollution Condition	A state in which the environment has changed or been contaminated, degrading environmental quality (e.g., water, air, or soil pollution).
Pollution Source	A community, industrial factory, building, structure, vehicle, business location, or any other origin of pollution.
State Agency	A government department, state enterprise, public organisation, local government organisation, or other state entity established by law.
Local Authority	The Governor of Bangkok, for the Bangkok Metropolitan Administration area.

Key provisions relevant to Bangkok's governance and administration

Section	Provision
§9	In a pollution emergency, the Prime Minister may order government agencies, enterprises, or affected persons to take control measures; this power may be delegated to a provincial governor.
§37	The governor of a designated Environmental Protection Area or Pollution Control Zone must formulate a Provincial Action Plan for Environmental Quality Management, submitted to the National Environment Board for approval.
§59	The National Environment Board may designate a locality as a Pollution Control Zone where pollution threatens public health or environmental quality.
§60	Local officials in a designated Pollution Control Zone must survey pollution sources, inventory them, and prepare an Action Plan for Pollution Reduction and Elimination.
§65	Officials may order a non-compliant vehicle's use banned, absolutely or temporarily, until it meets emission standards.
§66	Ban orders must be marked with a visible "Strictly prohibited" or "Temporarily prohibited" emblem, per Ministerial Regulation.
§67	Officials may stop vehicles for inspection and examine engines and equipment for compliance.

Together, these provisions cover BMA's authority from definitional scope (§4) through area-based crisis management (§§37, 59, 60) to source-directed vehicle enforcement (§§65–67). Presently, the National Environment Board has exercised its §59 authority to designate the Bangkok Metropolitan Area as a Pollution Control Zone,²⁶ in effect each year from November to March.

²⁶ Notification of the National Environment Board Re: Designation of the Bangkok Metropolitan Area as a Pollution Control Zone, B.E. 2568 (2025), *Royal Thai Government Gazette*, published September 16, 2025, effective the day following publication.

B. The Disaster Prevention and Mitigation Act, B.E. 2550 (2007)²⁷

This Act serves as Thailand's primary legislation for disaster management, structured in two parts. The first defines the roles, powers, and duties of relevant agencies — central administration, regional administration, local administrative organizations, and cooperating military and public welfare bodies — positioning local administrative organizations as the primary, first-line responders within their own areas. The second part governs the disaster prevention and mitigation process before, during, and after a disaster, emphasizing proactive management and cross-sector cooperation. The Act also prescribes the powers and duties of directors at each operational level.

Key definitions (Section 4)

Term	Definition
Disaster	Fire, storm, flood, drought, human/animal/aquatic epidemic, plant pest outbreak, or any other public peril — natural, human-caused, or accidental — that endangers life or property. Explicitly includes air perils and sabotage.
State Agency	A government agency, state enterprise, public organization, or other state entity — but excludes local administrative organizations.
Local Administrative Organization	A sub-district administrative organization, municipality, provincial administrative organization, Pattaya City, the Bangkok Metropolitan Administration, or other local body established by law.
Director	The Central, Provincial, District, or Local Director, and the Bangkok Metropolitan Administration Director.

Key provisions relevant to Bangkok's governance and administration

Section	Provision
§21	The Local Director must act promptly on a disaster, with power to mobilize personnel, requisition equipment and communications systems, request inter-agency assistance, order evacuations, and provide relief to victims.
§29	Directors may prohibit entry, residence, or business operation in a disaster area, specifying duration and boundaries.
§32	The Governor of Bangkok serves as BMA Director, with powers to formulate BMA's Disaster Prevention and Mitigation Plan, supervise volunteer training, provide relief, and command BMA agencies and departments — including coordinating with external state agencies to ensure Plan compliance.
§37	BMA Assistant Directors must act promptly on a disaster and notify the BMA Director; Sections 21(2), 22(3)–(4), and 24–30 apply mutatis mutandis to BMA.

²⁷ Disaster Prevention and Mitigation Act, B.E. 2550 (2007), *Royal Thai Government Gazette*, vol. 124, part 52 A (September 7, 2007): 1–43.

Together, these provisions position BMA — through the Governor acting as BMA Director — as the primary first-line authority for disaster response within its territory, with command authority over its own agencies but a continuing dependence on coordination with central and regional bodies for cross-boundary or large-scale response.

2.1.2 Group 2: Laws Granting Authority for Source-Directed Pollution Control and Elimination

1. The Road Traffic Act, B.E. 2522 (1979)²⁸

Enacted to maintain order in land traffic, ensure public safety, and protect public welfare, this Act regulates both driver behaviour and vehicle condition — including air pollution and black smoke emissions exceeding prescribed standards.

Provision	Effect
§143	Traffic officers may order a driver to stop for inspection if the vehicle appears non-compliant, and may issue a temporary suspension order until repairs are made.
Enforcement authority	Vested exclusively in traffic officers under the Royal Thai Police — not BMA officials.

BMA's role under this Act is limited to that of an official's assistant: providing black-smoke measuring equipment and personnel to inspect exhaust readings alongside traffic police. Fines and vehicle-ban markings must be issued exclusively by traffic officers. Vehicle pollution management under this Act therefore operates as an integrated cooperative, with BMA supplying data, planning, and resources to support traffic police enforcement rather than enforcing directly.

2. The Land Transport Act, B.E. 2522 (1979)²⁹

Regulates and controls vehicles to address air pollution through inspection and fiscal incentives.

Provision	Effect
Vehicle inspection officers	Examine cleanliness, structural soundness, and control-component compliance for vehicles seeking registration or annual taxation.
Tax incentives	Reduced annual vehicle tax rates for electric, alternative-energy, and natural-gas vehicles, to promote source-level pollution reduction.

²⁸ Road Traffic Act, B.E. 2522 (1979), Royal Thai Government Gazette, vol. 96, part 8 special issue (January 29, 1979): 1.

²⁹ Land Transport Act, B.E. 2522 (1979), signed March 15, 1979.

3. The Factory Act, B.E. 2535 (1992) and its Amendments³⁰

An important mechanism for pollution and environmental management related to air quality.

Provision	Effect
Ministerial regulations	The Minister may prescribe standards and methods controlling waste, pollutant, and emission discharge from factory operations.
Equipment mandate	Factories must install equipment to prevent, suppress, or mitigate danger, damage, or nuisance to persons or property nearby.
Expansion exemptions	Operators are exempted from expansion-permission requirements where the expansion is for pollution treatment, improving existing treatment systems, reducing nuisances, or altering power-generating machinery to lessen environmental impact.
Non-compliance	Where an operator fails to comply with an official order, authorities may undertake remedial action to ensure compliance.

Constraints in practice

Taken together, the laws in this group leave BMA with meaningfully constrained enforcement capacity. Under the Road Traffic Act and the Land Transport Act, enforcement authority over vehicles rests with traffic police and Department of Land Transport inspectors, not BMA officials — limiting BMA's role over large vehicles, including heavy trucks and buses, to providing data, equipment, and personnel support, with no independent power to stop, inspect, or penalize a non-compliant vehicle directly.

A parallel gap exists under the Factory Act. BMA officials cannot be appointed as pollution control officers under NEQA and hold no independent on-site inspection authority over factories; their corrective-order authority is limited to Category 1 and Category 2 factories, while suspension, closure, and licence revocation for Category 3 factories — the only category requiring a licence — rest exclusively with the Permanent Secretary of the Ministry of Industry.³¹ Continuous emissions monitoring data from factory stacks, where it exists, flows to the Department of Industrial Works, not to BMA, further limiting the city's evidentiary basis for enforcement action.

³⁰ Factory Act, B.E. 2535 (1992), Royal Thai Government Gazette, vol. 109, part 44 (April 9, 1992): 62.

³¹ Ministry of Industry, Order No. 337/2563 on Appointment of Local Government Officials (Bangkok Metropolitan Administration) as Competent Officials under the Factory Act B.E. 2535 (1992) and Its Amendments (November 17, 2020).

2.1.3 Group 3: Laws Relating to Public Health Protection and Welfare

The Public Health Act, B.E. 2535 (1992) and its Amendments³²

A vital statutory tool for preserving appropriate living conditions. On air quality specifically, the Act controls public nuisances — actions generating odors, dust, particulate matter, soot, ash, or toxic vapors to a degree that degrades health — including supervision of buildings and premises lacking adequate ventilation or emission control.

Key definitions (Section 4)

Term	Definition
Local Government	A provincial administrative organization, municipality, sub-district administrative organization, BMA, Pattaya City, or other local body established by law.
Local Ordinance	An ordinance, by-law, or regulation enacted by Local Government.
Local Official	The Governor of Bangkok, for the area within the Bangkok Metropolitan Area.

Key provisions

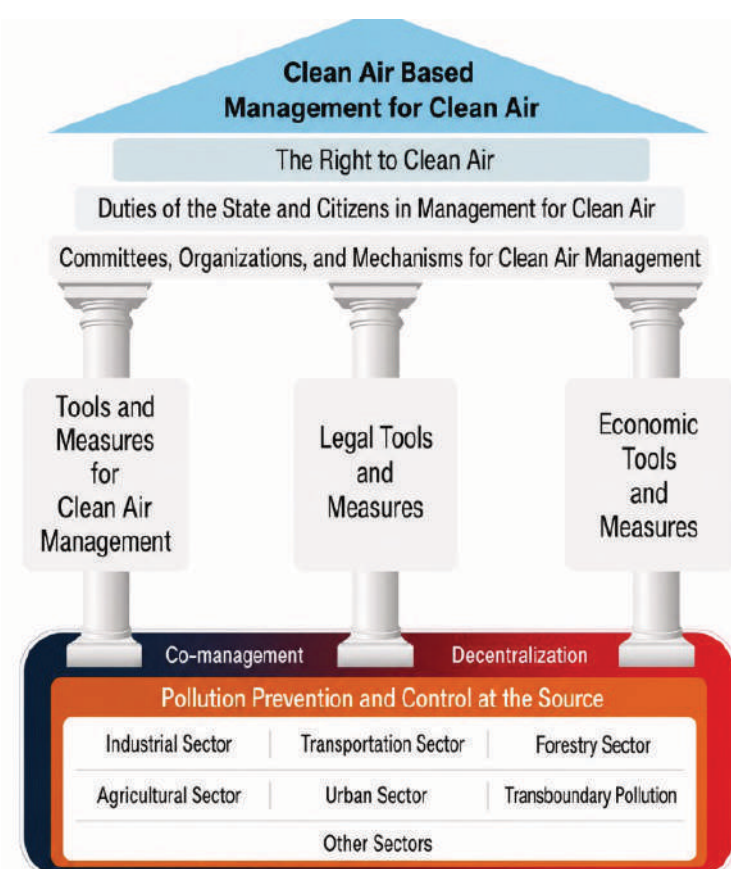
Section	Provision
§26	Local officials may prohibit public nuisances in public or private premises and issue written suppression orders; extends to roads, waterways, drainage, and canals.
§27	For nuisances in public places, officials may order the responsible person to suppress it within a set timeframe; on non-compliance where public health is seriously endangered, officials may act directly, with costs borne by the responsible party.
§28	For nuisances on private premises, officials may order the owner to suppress it; on violation, officials may act directly and recover costs. Where the hazard is severe, officials may prohibit use of the premises until resolved.
§28/1	Where a nuisance under §27/§28 becomes widespread enough to pose a public health hazard, officials may declare a Public Nuisance Control Zone, per criteria set by the Minister and published in the Gazette.

³² Public Health Act, B.E. 2535 (1992), Royal Thai Government Gazette, vol. 109, part 38 (April 5, 1992): 27.

Constraints in practice

While the Public Health Act gives BMA a direct, self-contained basis to act on air pollution as a public nuisance, its enforcement pathway is in practice slow and multi-staged. A case must move through inspection, an administrative order, extended rectification periods of up to 30 days (renewable twice, in 15-day increments), and referral to the municipal law enforcement unit and the police before it can reach prosecution — despite BMA officials holding police status under the Code of Criminal Procedure. This can limit the speed with which nuisance-based enforcement responds to continuing pollution. In addition, operators of health-hazardous businesses are not generally required under the Act to install emission monitoring equipment, limiting the availability of emissions data for facilities licenced by the BMA. These constraints illustrate that the effectiveness of the existing framework depends not only on the legal powers available to the BMA, but also on the information, administrative capacity, and enforcement mechanisms available to exercise those powers.

Figure 1: Conceptual Framework and Core Principles of the Draft Clean Air Act, B.E. (Currently under parliamentary consideration)³³



³³ Thailand. *Draft Act to Regulate the Integrated Management of Clean Air for Health* B.E. draft bill under parliamentary consideration).

The draft Clean Air Act seeks to establish a more integrated framework for air-quality management across different pollution sources and levels of government. The draft has been developed through contributions from government agencies, political parties, civil society and parliamentary processes. The draft Clean Air Act was formulated by fusing conceptual models from government agencies, political parties, civil society, and the House of Representatives. Among its stated objectives is recognition of the public's right to clean air and the establishment of mechanisms to address air pollution and its impacts, including on public health and vulnerable groups. The draft remains under parliamentary consideration.

Mechanism	Description
Committee structure	Multi-tiered, spanning policy, regulatory, academic, and economic-instrument levels down to provinces and BMA.
Sectoral scope	Six primary pollution sources: industrial, transport, forestry, agricultural, urban, transboundary haze.
Economic instruments	Taxes, fees, an emissions trading system (ETS), and deposit-refund systems.
Clean Air Fund	Finances pollution-reduction activities and compensation for affected individuals.
Spatial management	Area classification by air quality criteria; authority to declare Air Pollution Surveillance Zones or Air Pollution Disaster Zones.
Public participation	Rights to access information, monitoring, and decision-making.
Penalties	Criminal sanctions, regulatory fines, and civil liability requiring compensation.

An important feature of the draft is its emphasis on **area-based and decentralized implementation**. Provincial and Bangkok-level mechanisms would have responsibilities for assessing local air-quality conditions and developing appropriate action plans. The draft also provides for enhanced responses in areas experiencing serious pollution and for coordination mechanisms where pollution crosses administrative boundaries. These provisions could strengthen the capacity of local authorities to respond to pollution according to local conditions, while also creating clearer mechanisms for coordination between local and national authorities.

Compared with existing law, the draft Act would provide a more comprehensive legal architecture for air-quality management. Where current statutes focus on source control and physical environmental management, the draft elevates public administration into a comprehensive human rights framework, formally guaranteeing the right to clean air as tied to human dignity, life, and health. From a Human Rights City perspective, its significance lies in the extent to which these mechanisms could translate the recognition of clean air as a public interest and rights-related concern into concrete institutional responsibilities, access to information, participation, accountability, and protection for affected populations.

For Bangkok, this could provide an important legal foundation for strengthening the human rights dimensions of clean-air governance. It could also help address some of the limitations arising from the BMA's restricted authority over pollution sources outside the city. At the same time, the effectiveness of these reforms would depend on the final content of the legislation, the allocation of responsibilities between national and local authorities, the availability of resources and technical capacity, and the implementation and enforcement mechanisms established in practice.

2.1.4 Structural Constraints Across the Legal Framework

Assessed together, the laws examined above reveal two structural constraints that no single statute resolves on its own.

- ▶ First, BMA cannot expand its own statutory authority to respond to pollution. The Council of State's advisory opinions have consistently confirmed that BMA may exercise only the powers expressly conferred by its enabling legislation, with no implied extension of those powers. BMA therefore cannot respond to new or worsening pollution problems unless a legal basis already exists or is subsequently created by legislation. For example, BMA has been found to lack authority to restrict non-electric vehicles for pollution reduction **absent** an express statutory basis, and to issue binding orders to private landowners on sanitation matters beyond the authority specifically delegated to it.
- ▶ Second, even where BMA has legal authority to act, its fiscal capacity to do so is constrained. Under Thai public law, local authorities may levy taxes or fees only where an enabling statute specifies the relevant tax base, taxpayer class, and rate ceiling. No current legislation expressly authorises BMA to impose an “air pollution fee” or PM2.5 charge in its own right.

2.2 Policies, Strategies, Plans, and Measures

Thailand's clean-air governance is supported by a range of national strategies, development and environmental plans, and more specific action plans. These instruments perform different functions: some establish broad national priorities, while others translate those priorities into environmental objectives, PM2.5-specific measures, or local implementation.

For this toolkit, the relevant instruments can be understood as a policy chain:



National strategic direction → development and environmental policy → PM2.5 implementation framework → Bangkok-level implementation.

The instruments below are mapped according to this function rather than simply by their formal planning level.

2.2.1 Overarching National Strategic Direction: 20-Year National Strategy (2018–2037)³⁴

The 20-Year National Strategy (2018–2037) provides the overarching framework for national development and is translated into more specific plans at subsequent levels. For clean-air governance, Strategy 5: Eco-Friendly Development and Growth is particularly relevant. The goal is to achieve the Sustainable Development Goals across all dimensions: social, economic, environmental, good governance, and partnership. It focuses on building integrated partnerships both domestically and internationally, placing emphasis on using spatial-based approaches as the basis for defining strategies and plans, and encouraging participation from all sectors.

Two sub-strategies are particularly relevant:

► **Sustainable Growth in a Green Economic Society**, which promotes sustainable production and consumption, pollution monitoring and control, emissions management, and traceability of raw-material sources.

► **Development of Urban, Rural, Agricultural and Eco-Industrial Areas**, which promotes sustainable urban development, pollution reduction, environmental standards and systematic pollution management, including air pollution.

The Strategy therefore provides the broad policy direction for pollution prevention, environmental management and sustainable urban development, rather than prescribing specific PM_{2.5} measures.

2.2.2 National PM_{2.5} and Environmental Implementation Frameworks

Environmental Quality Management Plan (2023–2027)³⁵

The Environmental Quality Management Plan (2023–2027) translates broader environmental policy into implementation priorities. Strategy 4, Managing the Environment and Pollution Affecting the Entire Ecological System, focuses on preventing, reducing, controlling and eliminating pollution. It sets a target that 80% of areas should show improved air quality during 2023–2027 and identifies national and local authorities, including BMA, among the responsible agencies.

³⁴ 20-Year National Strategy (2018–2037), Office of the National Economic and Social Development Council, Royal Thai Government Gazette, vol. 135, part 82 A (October 13, 2018): 1–48.

³⁵ Office of Natural Resources and Environmental Policy and Planning (ONEP), Environmental Quality Management Plan B.E. 2566–2570 (2023–2027) (Bangkok: Ministry of Natural Resources and Environment, 2022).

Second Action Plan to Drive the National Agenda “Solving Dust Pollution Problems” (2025–2032)³⁶

The Second Action Plan to Drive the National Agenda “Solving Dust Pollution Problems” is the most directly relevant national framework for PM2.5 and dust pollution. It brings together measures addressing major pollution sources, including urban and industrial emissions, forest and agricultural burning, and transboundary haze. It also includes measures relating to monitoring, public warnings, health, research and legal development.

The Plan sets an overall objective of maintaining 24-hour average PM2.5 concentrations at levels that do not pose a health hazard and reducing burnt areas by at least 50% compared with the previous five-year average. Its measures include:

- ▶ **urban sources:** EVs and low-emission vehicles, Low Emission Zones, congestion charging, industrial emissions inventories and economic instruments;
- ▶ **forest sources:** fuel management, forest monitoring and community forest networks;
- ▶ **agricultural sources:** burn management, agricultural-residue management and supply-chain traceability;
- ▶ **transboundary haze:** international cooperation and green supply chains; and
- ▶ **management capacity:** data systems, public warnings, health measures, research and legal development.

Importantly, the Plan provides the national PM2.5 framework within which more specific local action plans are developed, rather than constituting Bangkok's implementation plan.

2.2.3 Bangkok-Level Implementation

PM2.5 Mitigation Action Plan for the Bangkok Metropolitan Area (2026)³⁷

The PM2.5 Mitigation Action Plan for the Bangkok Metropolitan Area, 2026 translates the national PM2.5 framework into measures for Bangkok. The BMA formulated the Plan under the Second National Agenda Action Plan on “Solving Dust Pollution Problems” and uses it to guide relevant agencies in carrying out their respective duties, powers and legal mandates.

³⁶ Office of Natural Resources and Environmental Policy and Planning (ONEP), "Action Plan to Drive the National Agenda 'Solving Dust Pollution Problems,' Phase 2, B.E. 2568–2570 (2025–2027) and the Subsequent Five-Year Period," EQM Platform, accessed August 1, 2026, <https://eqmplatform.onep.go.th/public-plan/detail/1053>.

³⁷ Bangkok Metropolitan Administration (BMA), *PM2.5 Mitigation Action Plan B.E. 2569 (2026)* (Bangkok: BMA Department of Environment, 2025).

The Plan has three main components:

1. Year-round measures, including air-quality forecasting and public warnings, expansion of district-level monitoring, Dust Detective teams, industrial and construction-site inspections, EV promotion, open-burning management, and public-health measures such as dust-free rooms and the BKK Clean Air Area initiative.
2. Measures triggered by elevated PM2.5 levels, including increased public warnings, restrictions on certain vehicles and construction activities, Low Emission Zone measures, school measures, and potential designation of Nuisance Control Zones or emergency assistance zones at more severe levels.
3. Long-term measures (2026–2030), including Euro 6 standards for new diesel vehicles, integrated public transport, electric public buses and government vehicles, increased green space, improved health-warning systems and dust-free childcare facilities.

How the instruments connect

The relationship between these instruments can therefore be summarized as follows:



This distinction is important for assessing implementation. The existence of a policy commitment at the national level does not necessarily mean that the BMA has the legal authority, resources or institutional mechanisms needed to implement it. The mapping therefore provides the policy context for the subsequent analysis of BMA's legal powers, institutional arrangements and practical measures.

2.2.4 National Development and Environmental Policy

Several national plans translate the broad direction of the National Strategy into more specific development and environmental priorities relevant to air quality.

Master Plans under the National Strategy (2018–2037)

The Master Plans under the National Strategy provide more specific strategic guidance. The most relevant component to clean air is the sub-plan on Development of Urban, Rural, Agricultural and Eco-Industrial Areas.³⁸ It addresses pollution at source, pollution-management infrastructure, air-quality standards and area-specific emission controls, as well as the prevention and reduction of transboundary pollution. It sets a target for 90% of identified target areas to meet Thailand's national air-quality standards during 2023–2027.

The 13th National Economic and Social Development Plan (2023–2027)³⁹

The 13th National Economic and Social Development Plan brings air pollution into Thailand's medium-term development agenda. PM2.5 is relevant to several milestones, particularly those concerning agriculture, the transition to electric vehicles and the development of a circular and low-carbon economy. For transport and logistics, the Plan includes an indicator aimed at reducing PM2.5 and greenhouse-gas emissions by 4% per year during 2023–2027. It also promotes databases, legislation, economic incentives and institutional capacity for pollution reduction.

The Plan therefore connects clean-air objectives with agricultural policy, transport transition, low-carbon development, economic instruments and institutional capacity, although the level of specificity of targets varies across its different milestones.

³⁸ Office of the National Economic and Social Development Council (NESDC), *Master Plans under the National Strategy (2018–2037): Issue 18 Eco-Friendly Growth* (Bangkok: Office of the Prime Minister, 2018), sub-plan 4 (Development of Urban, Rural, Agricultural and Eco-Industrial Areas).

³⁹ Office of the National Economic and Social Development Council (NESDC), *The Thirteenth National Economic and Social Development Plan (2023–2027)* (Bangkok: Office of the Prime Minister, 2022).

National Policy and Plan for the Promotion and Conservation of Environmental Quality (2017–2037)⁴⁰

The National Policy and Plan for the Promotion and Conservation of Environmental Quality provide a longer-term environmental policy framework. Under Policy 2: Create Eco-Friendly Growth for Wealth and Sustainability, it promotes resource efficiency, reduced pollution emissions and improved environmental quality and quality of life. Its relevant indicator concerns compliance of PM2.5 and PM10 levels with applicable standards, although the plan does not specify a quantitative target value for this indicator.

Taken together, these instruments establish the policy context for clean-air governance but do not themselves constitute Bangkok's operational PM2.5 response. More specific implementation frameworks sit below them.

2.3 International Human Rights Standards Regarding Clean Air

International human rights law provides an important framework for understanding the relationship between air pollution and human rights. Several international instruments and interpretations are particularly relevant.

General comment No. 36 - Article 6: right to life (CCPR/C/GC/36)⁴¹ recognizes environmental degradation, climate change and pollution as threats to the enjoyment of the right to life. It explains that States should take measures to preserve the environment and protect it against harm and pollution caused by both public and private actors. This establishes an important connection between environmental conditions and the State's obligations to protect life and human dignity.

The UN Committee on Economic, Social and Cultural Rights (CESCR), General Comment No. 14⁴² on the right to the highest attainable standard of health similarly requires States to take measures to protect people from harmful practices and activities by third parties and to ensure access to relevant health information. These obligations are relevant to air pollution because exposure to polluted air can create foreseeable risks to public health, particularly for groups that are more vulnerable to its effects.

⁴⁰ Ministry of Natural Resources and Environment (Thailand), *National Policy and Plan for the Enhancement and Conservation of National Environmental Quality B.E. 2560–2580 (2017–2037)* (Bangkok: Office of Natural Resources and Environmental Policy and Planning, 2017).

⁴¹ UN Human Rights Committee (HRC), *General Comment No. 36: Article 6 (Right to Life)*, September 3, 2019, UN Doc. CCPR/C/GC/36.

⁴² UN Committee on Economic, Social and Cultural Rights (CESCR), *General Comment No. 14: The Right to the Highest Attainable Standard of Health (Art. 12 of the Covenant)*, August 11, 2000, UN Doc. E/C.12/2000/4.

The Human Rights Council's Resolution 48/13 (2021)⁴³ further recognizes the human right to a clean, healthy and sustainable environment and calls on States to take measures to protect human rights when addressing environmental challenges, with additional measures for people particularly vulnerable to environmental harm.

Taken together, these standards provide a human rights framework for assessing air-quality governance. They highlight several principles relevant to clean-air policy: protection of life and health; prevention of environmental harm; equality and non-discrimination; access to environmental information; participation; accountability; and particular attention to people who may be disproportionately affected by pollution.

For Bangkok, these standards are relevant primarily through Thailand's international human rights obligations and their implementation through national and local governance. The BMA therefore has an important role in translating these principles into local policy and practice within the scope of its legal powers and responsibilities. Its responsibilities in areas such as environmental management, public health, urban planning, information provision and local service delivery provide entry points for applying a human rights-based approach to air-quality governance.

A Human Rights City approach can provide an additional framework for strengthening these practices by asking not only whether air pollution is reduced, but also whether clean-air governance is **participatory, transparent, accountable, non-discriminatory and attentive to groups facing heightened risks**.

2.4 Institutional and Governance Readiness Overview

Beyond the question of what the BMA is legally empowered to do, a rights-based approach to air-quality governance also depends on whether its institutional architecture enables those powers to be exercised in a coordinated and accountable manner.

Air-quality functions are distributed across several BMA departments whose mandates intersect but are not fully consolidated. These include the **Department of Environment**, including its Air Quality and Noise Management Division, which is responsible for air-quality monitoring, the Dust Detective programme and sensor-network operations; the **Public Health Department**, which carries out relevant licensing and nuisance-control functions under the Public Health Act; the **Medical Service Department**, which holds health-related information relevant to assessing the impacts of air pollution; and the **Strategy and Evaluation Department**, which is responsible for long-term BMA development planning.

⁴³ UN Human Rights Council (UNHRC), *The Human Right to a Clean, Healthy and Sustainable Environment*, Resolution 48/13, October 8, 2021, UN Doc. A/HRC/RES/48/13.

This distribution creates at least two coordination challenges.

First, internal coordination. Within BMA itself, health-impact data held by the Medical Service Department is not currently subject to a formal, standing data-sharing protocol with the Department of Environment, meaning that the evidentiary link between air quality and health outcomes — central to the rights to life and health discussed in Section 2.3 — is not systematically captured for policy use.

Second, coordination with external authorities. Many important pollution sources and enforcement functions fall partly or wholly outside BMA's institutional hierarchy. Joint black-smoke inspections, for example, involve the Traffic Police, Pollution Control Department and Department of Land Transport. Oversight of certain industrial facilities requires coordination with the Ministry of Industry, including where licensing powers remain with national authorities. Pollution originating outside Bangkok, including agricultural and forest burning, pollution from neighboring provinces and transboundary haze, likewise requires cooperation beyond the BMA's jurisdiction.

The effectiveness of these arrangements therefore depends not only on the BMA's own institutional capacity, but also on the clarity, continuity and accountability of inter-agency coordination. Where cooperation is primarily conducted on a case-by-case basis, there may be limited mechanisms for establishing shared decision-making, systematic data exchange, or clear accountability for outcomes that cross institutional and administrative boundaries.

This has direct implications for a human rights-based approach. Effective protection of rights affected by air pollution requires governance arrangements that can identify risks, generate and share relevant information, coordinate responses, provide meaningful opportunities for participation, and establish clear lines of responsibility. The institutional challenge is therefore not necessarily to consolidate all air-quality functions within one BMA department, but to ensure that the existing distribution of functions is supported by **effective coordination mechanisms and clearly defined responsibilities**.

Against this background, the proposed **cross-jurisdictional health-data-sharing mechanism and standing BMA–national coordination mechanism** can be understood as potential responses to identified coordination gaps. Their value would lie in moving important aspects of inter-agency cooperation from informal or case-specific arrangements towards more systematic mechanisms for information-sharing, coordination and accountability.

PART 3:

Global Experiences in Human Rights Cities and Air Quality Governance



3.1. Key Elements of a Human Rights City Approach

The Human Rights City approach seeks to translate human rights principles into local governance. In the context of environmental governance, this involves integrating human rights considerations into local policies, institutions, decision-making processes, access to information, participation, and accountability.

Experiences from different cities illustrate several recurring elements of a Human Rights City approach that are relevant to environmental and air quality governance.

Political commitment

Political commitment can provide an important foundation for integrating human rights into local governance. For example, the C40 Clean Air Cities Declaration, signed by 35 metropolitan cities including London, Jakarta, Tokyo, and Washington, D.C., commits cities to ambitious pollution reduction targets, equitable clean air policies, and transparent public reporting.⁴⁴ Importantly, the declaration explicitly recognizes clean air as a human right, reinforcing the need for human rights to be embedded within local environmental governance.

Institutional coordination

Effective implementation is typically supported by dedicated governance bodies that coordinate policy across sectors. Bangkok has already taken an important step by establishing the Committee for the Prevention and Resolution of Fine Particulate Matter (PM2.5) Problems, chaired by the Governor, to oversee monitoring, inter-agency coordination, and public communication. The remaining challenge is to strengthen its mandate through a more institutionalized and legally grounded governance framework.⁴⁵

Meaningful participation

Human Rights Cities move beyond one-way public consultation by creating mechanisms that enable residents to participate in environmental decision-making. Seoul's collaborative approach to air quality governance illustrates how citizens can be actively involved in shaping and monitoring clean air policies rather than serving only as recipients of information.⁴⁶ Other cities have developed more targeted forms of participation. Camden's Citizens' Assembly on the Climate Crisis and the British Science Association's Community Leaders Programme, for example, provide mechanisms for engaging residents and community leaders beyond general public consultation.

⁴⁴ C40 Cities, "35 Cities Unite to Clean the Air Their Citizens Breathe, Protecting the Health of Millions," October 11, 2019, accessed August 5, 2026, https://www.c40.org/press_releases/35-cities-unite-to-clean-the-air-their-citizens-breathe-protecting-the-health-of-millions.

⁴⁵ C40 Cities, "Tackling Air Pollution in Bangkok," accessed August 5, 2026, <https://www.c40.org/case-studies/tackling-air-pollution-in-bangkok/>.

⁴⁶ Seoul Metropolitan Government, "Clear Sky, Clean Seoul," accessed August 5, 2026, <https://english.seoul.go.kr/clear-sky-clean-seoul/>.

Access to information and public awareness: cities also strengthen environmental rights by ensuring timely access to air quality information and investing in public education. The Breathe Cities network, which includes Bangkok, supports this approach through initiatives such as public PM2.5 information platforms, community awareness campaigns, and youth engagement programmes in cities such as Johannesburg and Accra. These initiatives operationalize the right to information as a continuous public service rather than a one-time disclosure obligation.

Accountability and grievance mechanisms

Dedicated complaint mechanisms for environmental rights remain relatively uncommon. Examples such as Montreal's Ombudsman, Graz's Human Rights Advisory Board, and Gwangju's Human Rights Office demonstrate how specialized institutions can strengthen accountability, although most cities continue to rely on broader human rights complaint systems. This gap highlights the potential value of Bangkok's proposed Environmental Rights Desk discussed later in this report.

Inclusive engagement

Some cities have adopted targeted participation mechanisms to ensure that underrepresented groups are meaningfully represented. Camden's Citizens' Assembly on the Climate Crisis and the British Science Association's Community Leaders Programme illustrate approaches that deliberately engage randomly selected residents and community leaders rather than relying solely on open public consultations.

Taken together, these examples illustrate a range of institutional and governance mechanisms through which human rights principles can be incorporated into local environmental governance. They also demonstrate that the Human Rights City approach can operate through different institutional arrangements, depending on the local governance context.

3.2. Comparative Examples of Human Rights Cities

The following examples illustrate how selected Human Rights Cities have developed institutional structures, information systems, participation mechanisms, and accountability arrangements. They are presented as comparative examples rather than models for direct replication.

3.2.1 Vienna, Austria

Following a citywide participatory process, on 19 December 2014, Vienna City formally declared Vienna a "City of Human Rights," embedding fundamental rights obligations across all municipal functions.⁴⁷ To operationalize the declaration, the city established the Human Rights Office (Menschenrechtsbüro) in September 2015 within the Chief Executive Office. It serves as the central administrative hub to mainstream rights, coordinate policy across city departments, and oversee the implementation of human rights projects. The Human

⁴⁷ Stadt Wien, "Declaration: Vienna City of Human Rights" (Resolution of the Vienna City Council, December 19, 2014), <https://www.wien.gv.at/pdf/menschenrechtsbuero/human-rights-declaration.pdf>.

Rights Office actively supports local non-governmental organizations and human rights actors through capacity-building workshops, educational initiatives, research partnerships, and networking platforms.

Vienna enacted the Vienna Climate Act (Wiener Klimagesetz) in 2025. The Act sets a clear target for achieving climate neutrality by 2040. This ambition applies not only to the city administration but also to broader municipal operations. The Act further emphasizes raising awareness and building support for climate objectives across civil society, public administration, businesses, and other regional actors, while promoting participation and social justice, with particular attention to vulnerable groups.

The City of Vienna has developed a long-standing Open Government Data (OGD) policy under which publicly held administrative data is made available for public use.⁴⁸ The city began publishing open data in 2011 and has progressively expanded its catalogue. The data covers a wide range of municipal functions, including the environment and weather data. Vienna's OGD provides several hundred data sets that provide detailed information, such as on measurement data of air pollutants. Data is generally provided under a Creative Commons Attribution (CC BY 4.0), which allows the public to reuse the information provided that the source is acknowledged. This practice indicates that rather than simply publishing pollution measurements, the city has sought to create an ecosystem in which government data can be accessed, reused, analyzed and transformed into tools and applications by different actors.

In the City of Vienna, public grievances and complaints are handled through a multi-tiered architecture structured around national administrative oversight, specialized ombuds-offices, and direct citizen service portals. The Austrian Ombudsman Board (Volksanwaltschaft) is an independent, state supervisory body whose mandate is anchored in the Austrian Federal Constitution and the Ombudsman Act.⁴⁹ Operating as Austria's "House of Human Rights," the AOB safeguards citizens' rights, monitors public administration, and protects fundamental freedoms. To ensure tailored protections for specific rights and vulnerable demographics, Vienna operates dedicated ombudsperson offices within municipal governance. For instance, Vienna Child and Youth Ombudsman (Kinder- und Jugendanwaltschaft Wien - KJA). KJA is an independent body advocating for the rights of children and young adults, offering confidential grievance channels and advice on rights violations, school issues, or child protection concerns.

⁴⁸ "Open Data," Digitales Wien, City of Vienna, accessed August 5, 2026, <https://digitales.wien.gv.at/open-data/>.

⁴⁹ Volksanwaltschaft (Austrian Ombudsman Board), "The Tasks of the Austrian Ombudsman Board," accessed August 5, 2026, <https://volksanwaltschaft.gv.at/en/the-austrian-ombudsman-board/tasks/>.

Strategic Relevance to the BMA:

- ▶ Vienna demonstrates that establishing a dedicated human rights unit inside the executive office (such as under the Office of the Permanent Secretary for the BMA) creates a central engine to integrate rights standards across all municipal departments, avoiding fragmented responsibility.
- ▶ Vienna's OGD framework illustrates that open data must go beyond posting static reports. For Bangkok, publishing real-time, machine-readable air quality, spatial, and health metrics under open-use licences empowers researchers, tech developers, and civil society to build public-facing monitoring tools and actionable health interventions.
- ▶ The Vienna KJA provides a model for safeguarding specific populations. In Bangkok, where seasonal PM2.5 pollution disproportionately affects children in high-density school zones, establishing specialized youth- and vulnerable-group oversight channels helps translate general environmental commitments into actionable safeguards.
- ▶ Vienna's multi-tiered architecture highlights the importance of distinguishing policy coordination (managed by the Human Rights Office) from independent grievance handling (managed by the Volksanwaltschaft and sector ombudspersons). For the BMA, this supports structuring a proposed Environmental Rights Desk as an independent, transparent intake mechanism while leaving policy coordination to executive departments.

3.2.2 Lund, Sweden

Lund was designated Sweden's first Human Rights City in August 2018 following a process in which the municipality, together with the Raoul Wallenberg Institute of Human Rights and Humanitarian Law (RWI), examined how the municipality could work systematically with human rights.⁵⁰ The approach links human rights with public health and social sustainability. Lund's Programme for Social Sustainability 2020–2030 provides the principal framework for this work, to create equal living conditions and realize human rights for all people living and working in the municipality. The programme covers six areas: democracy; education and learning; living conditions; employment; housing and the local environment; and equality.⁵¹ Human rights are

⁵⁰ United Cities and Local Governments (UCLG), "Lund: Localizing Human Rights through Inclusive Urban Planning," Committee on Social Inclusion, Participatory Democracy and Human Rights (UCLG-CISDP), accessed August 5, 2026, <https://uclg-cisdp.org/en/cities-territories-human-rights-2030/lund>.

⁵¹ "Så arbetar vi med social hållbarhet" [How We Work with Social Sustainability], Lunds kommun, accessed August 5, 2026, <https://lund.se/kommun-och-politik/hallbara-lund/social-hallbarhet/sa-arbetar-vi-med-social-hallbarhet>.

integrated through analysis, targets and follow-up rather than treated as a stand-alone policy area.

The municipality has also sought to translate this rights-based approach into urban and spatial planning. Lund's planning framework explicitly links inclusive and equal urban development to the Human Rights City approach. Its planning strategies emphasize equal access to public facilities and services, including green spaces, public transport and other amenities, while promoting participation through dialogue, co-creation and feedback. The municipality also works with businesses, civil-society organizations, universities and other actors to develop and implement measures supporting human rights and social sustainability.

Lund's social sustainability framework links the quality of the physical environment to equality, health and human rights. The municipality recognizes that the design of neighborhoods affects how people live, work, move and interact, and identifies access to green areas, recreation, services and transport as elements of a good living environment. At the same time, healthy residential environments should be free from harmful environmental factors, specifically including poor air quality and noise.

The framework contains a specific target on harmful substances, air, noise and radiation. Lund states that residents should not be exposed to harmful substances, airborne particles, noise or radiation. The municipality currently assesses this target as uncertain to be achieved, which is useful to note because the framework functions not simply as a statement of ambition but also as a mechanism for monitoring progress and identifying implementation gaps.

Lund's Comprehensive Plan 2018 integrates climate and environmental objectives into spatial planning.⁵² It promotes compact urban development and prioritizes development around public transport nodes to reduce car dependence and associated emissions. The plan explicitly recognizes that the physical structure of the city affects climate impacts, and that transport choices affect health and environmental quality. This is a strong illustration of the shift from "air pollution as an environmental department issue" to "air quality as a cross-cutting urban governance issue."

Lund's social sustainability framework sets an explicit objective of creating equal opportunities for participation and influence.⁵³ The municipality seeks to achieve this through collaboration with civil society, accessible and understandable information, and measures to strengthen the rights and participation of particular groups. Lund has

⁵² Lunds kommun, *Översiktsplan 2018* [Comprehensive plan 2018] (Lund: Lunds kommun, 2018), accessed August 5, 2026.

⁵³ "Mål: Demokrati" [Goal: Democracy], Lunds kommun, accessed August 5, 2026, <https://lund.se/kommun-och-politik/hallbara-lund/social-hallbarhet/mal-demokrati>.

established Lunds unga röster,⁵⁴ a municipal initiative providing young people with opportunities to influence local democracy, while partnerships with non-profit and civil-society organizations provide channels for community engagement. The municipality also applies a rights-based approach to participation by requiring the interests and rights of children to be considered in municipal decisions and maintaining advisory structures representing persons with disabilities. These mechanisms are intended to ensure that residents can understand their rights, participate in decisions affecting their lives, and have their voices reflected in municipal governance. Lund also has a strategy and an action plan to work with the rights of national minority groups in line with the Act on the Rights of National Minorities.

The municipality also maintains an open-data approach. Lund publishes municipal indicators and links to comparable national data through Sweden's Kolada database.⁵⁵

Strategic Relevance to the BMA:

- ▶ Lund demonstrates how a Human Rights City can move from a formal political commitment towards an integrated municipal governance framework, linking human rights with social sustainability, public health, urban planning, participation, accessible information and collaboration with civil society.
- ▶ Lund's Programme for Social Sustainability uses environmental targets—such as exposure to air pollutants and noise—not merely as symbolic commitments, but as active monitoring tools where progress can be assessed as "uncertain" or "off-track." For the BMA, establishing transparent performance indicators that publicly report implementation gaps (especially during high-PM2.5 seasonal spikes) builds institutional accountability and helps redirect budget allocations where rights safeguards are failing.

3.2.3 Gwangju, Republic of Korea

Gwangju has established a relatively extensive institutional framework for human rights, rooted in its historical legacy as the birthplace of South Korea's modern democratization movement. The city enacted the Human Rights Improvement and Democratization, Human Rights, and Peace City Promotion Ordinance in 2007 and the Gwangju Human Rights Protection and Improvement Ordinance in 2013.⁵⁶ The

⁵⁴ "Påverka i Lund" [Influence in Lund], Lunds kommun, accessed August 5, 2026, <https://lund.se/kommun-och-politik/sa-kan-du-paverka/paverka-i-lund>.

⁵⁵ Council for the Promotion of Municipal Analysis (RKA), "Kolada: Kommun- och regiondatabasen" [Kolada: The Municipality and Region Database], accessed August 5, 2026, <https://www.kolada.se/>.

⁵⁶ Gyonggu Shin, Jean Ahn, and Jinhee Chon, "Human Rights City Gwangju: Its Development,

cornerstone of this framework is the Gwangju Human Rights Charter, adopted on 21 May 2012.⁵⁷ Crucially, the Charter was not designed as a top-down administrative decree; rather, it was drafted through an extensive, participatory social dialogue between the municipality, local civil society, legal experts, and residents. Functioning as a binding social agreement between the city and its citizens, the Charter establishes shared values and mutual commitments. The Charter translates abstract international standards into 18 binding articles that govern municipal administration across environmental, civic, social, and economic domains.

Gwangju also developed an implementation plan for the Charter.⁵⁸ Notably, the implementation plan mandates the city to conduct regular surveys on the human rights situation and publish the results using the Charter as a basis. In addition, the city also established a set of indicators with 18 targets and 100 indicators. A specific set of indicators is developed in relation to Clean Environment and Leisure Facilities, which include sub-indicators on the level of air pollution and environment-related civil complaints and their resolutions.⁵⁹

In August 2010, Gwangju became the first local government in South Korea to establish a dedicated Human Rights Office, initially staffed by 12 personnel across three specialized teams: Democracy and Human Rights, Human Rights and Peace Exchange, and the May 18 Movement Enhancement Team.⁶⁰ To further strengthen ordinance-based implementation, Gwangju created the Human Rights Civil Committee in 2012. Composed of city council members and advocacy representatives specializing in women's, migrant, and disability rights, the committee evaluates municipal human rights initiatives and issues policy recommendations to city leadership.⁶¹ Additionally, the municipality holds monthly coordination meetings with the regional office of the National Human Rights Commission of Korea, the local education council, and civil society organizations to align policy implementation.

Gwangju has operationalized fiscal co-governance through its Citizen Participation Budget System. Introduced in 2011 and expanded in 2017, the Participatory Budget System helps the city divert part of the budget's planning power from the city administration to citizens and to improve the transparency and fairness of the budgeting process.⁶² However, the system faces a major operational challenge: reconciling

Achievement and Limitations" (paper presented at the International Conference on Human Rights Cities, Gwangju, South Korea, September 30–October 3, 2019).

⁵⁷ Gwangju Metropolitan City, *Gwangju Human Rights Charter* (Gwangju: Gwangju City Hall, 2012).

⁵⁸ Ibid p. 21

⁵⁹ Ibid p. 33

⁶⁰ Soo A Kim, "Gwangju: The Evolution of a Human Rights City Model," *Monografias CIDOB*, no. 88 (2024): 106, https://www.cidob.org/sites/default/files/2024-10/105-114_SO0%20A%20KIM_ANG.pdf.

⁶¹ Ibid

⁶² Ibid p. 110

direct citizen decision-making with the statutory legislative oversight of elected councilors, who have repeatedly asserted their authority by defunding or slashing citizen-selected proposals.

Strategic Relevance to the BMA:

- ▶ Gwangju demonstrates that a municipal charter derives its legitimacy and long-term political durability from being a negotiated social agreement between city administration and its citizens. For the BMA, developing a strategic follow-up plan to substantiate its commitment to becoming a Human Rights City and its specific sector/thematic policies should include public hearings, civil society consultations, and district-level dialogues. These processes can build shared public ownership over the BMA's intention to become a Human Rights City and its implementation in different sector/thematic issues.
- ▶ True civic participation goes beyond non-binding public consultations. Shifting a portion of actual budget planning authority from municipal bureaucrats to citizens increases transparency, improves public trust, and ensures public spending aligns with genuine community needs.
- ▶ To prevent citizen-led initiatives from being defunded at the final hurdle, participatory mechanisms must be co-designed with the legislative council from the start. Establishing clear, shared selection criteria, legal non-overlap checks, and joint vetting protocols early in the budget cycle ensures legislative buy-in before public voting.

3.2.4 Quezon City, the Philippines

Quezon City has codified its human rights commitments through pioneering local legislation, most notably Ordinance No. SP-3412, S-2025, which explicitly defines and protects the rights and fundamental freedoms of human rights and environmental defenders while establishing binding obligations for the municipal and national governments and private establishments.⁶³ The Ordinance mandates the establishment of the Quezon City Human Rights Defenders Protection Desk to monitor cases of human rights violations against human rights defenders and coordinate with law enforcement agencies for immediate response and protection measures.

Under its Open Government Partnership (OGP) commitment, the Quezon City Government will optimize the data dashboard and

⁶³ Quezon City Council, Ordinance No. SP-3412, S-2025: An Ordinance Defining the Rights and Fundamental Freedoms of Human Rights Defenders in Quezon City (Quezon City Government, 2025), <https://qccouncil.quezoncity.gov.ph/ordinances/14258>.

integrate it within the QC E-Services platform.⁶⁴ This updated interface will transform the platform into a dynamic, user-friendly tool for transparency and accountability. The dashboard will feature accurate, relevant, and real-time public services data, utilities, and community updates, such as air quality.⁶⁵ To foster active civic engagement, the commitment integrates accessible digital mechanisms—such as interactive feedback forms and issue-tracking portals—directly into the city's data dashboard. These tools allow residents to submit grievances, offer policy inputs, and monitor municipal service responses in real time. Crucially, to bridge the digital divide for underserved populations, the city complements this online portal with physical barangay service kiosks and local digital literacy initiatives, institutionalizing inclusive public participation across all demographics.

To deepen fiscal co-governance, Quezon City is reforming its budgeting processes under its OGP commitments. Through its OGP commitments, the city is expanding participatory budgeting by allowing public involvement in government budgeting.

The city also established the People's Council of Quezon City (PCQC). Serving as a structured co-governance platform for more than 5,000 accredited civil society organizations, the PCQC institutionalizes civic participation across diverse sectors—including business, labor, youth, women, LGBTQIA+, and persons with disabilities (PWDs). By holding formal positions on local development bodies and municipal task forces, these sectoral representatives directly contribute to the formulation, implementation, and evaluation of city policies.⁶⁶

In environmental governance, the city established the Climate Change and Environmental Sustainability Department (CCESD) through a local ordinance.⁶⁷ The department is mandated to formulate and execute climate change mitigation, adaptation, and environmental sustainability strategies. It promotes efficient resource management by leveraging public advocacy campaigns, green technology solutions, environmental literacy, and active community participation.⁶⁸

⁶⁴ Open Government Partnership, "Quezon City, Philippines Commitment: Dynamic Data Dashboard for Transparency (PHQZT0003)," OGP Member Commitments, 2023, accessed August 5, 2026, <https://www.opengovpartnership.org/members/quezon-city-philippines/commitments/PHQZT0003/>.

⁶⁵ Open Government Partnership, "The Open Gov Challenge: Civic Space and Participatory Budgeting in Quezon City," OGP Challenge Tracker, 2024, accessed August 7, 2026, <https://www.opengovpartnership.org/the-open-gov-challenge/challenge-tracker/>.

⁶⁶ Quezon City Government, "Enacting of the People's Council (Ordinance SP-1942, S-2009)," Programme and Services Portal, accessed August 5, 2026, <https://quezoncity.gov.ph/programme/enacting-of-the-peoples-council/>.

⁶⁷ Quezon City Council, Ordinance No. SP-3009, S-2020: An Ordinance Creating the Climate Change and Environmental Sustainability Department (CCESD) under the Office of the City Mayor, Defining Its Powers, Duties, and Functions, and Appropriating Funds Therefor (Quezon City Government, 2020), <https://quezoncity.gov.ph/wp-content/uploads/2020/09/sp-3009-s-2020.pdf>.

⁶⁸ Quezon City Government, "Climate Change and Environmental Sustainability Department," Departments Portal, accessed August 5, 2026, <https://quezoncity.gov.ph/departments/climate-change-and-environmental-sustainability-department/>.

Strategic Relevance to the BMA:

- ▶ Quezon City's mandate for a Human Rights Defenders Protection Desk provides a direct functional model for the BMA's proposed Environmental Rights Desk (Question 22 of the BMA Self-Assessment Toolkit). It demonstrates how local governments can establish a mechanism to receive environmental grievances, coordinate immediate protective responses, and monitor rights violations against defenders.
- ▶ Unlike ad-hoc consultative bodies, the PCQC secures a formal seat on local development committees and task forces for accredited civil society groups. Establishing a similar body with formal advisory roles in the BMA and the city council would legally embed public participation into municipal decision-making.
- ▶ The creation of the CCESD by local ordinance demonstrates how the BMA can permanently institutionalize environmental and climate policy within municipal law—moving beyond non-binding master plans by establishing an ordinance-backed department tasked with green technology adoption, advocacy campaigns, and sustainable resource management.

PART 4:

Self-Assessment Tool and the Dimensions Linking Human Rights and Urban Air Quality Management



Photo source: pexels/Zaonar Saizainalin

Parts 2 and 3 together establish the two poles against which Bangkok's clean air governance must be measured. Part 2 mapped the legal and policy architecture BMA currently operates within — showing that existing law grants real but constrained authority, and that the draft Clean Air Act's explicit recognition of the right to clean air marks a significant, if not yet enacted, shift toward a rights-based foundation.

Part 3 then looked outward, examining how other cities that have already undertaken a comparable transition have translated human rights commitments into institutional structures, data systems, and participatory mechanisms. Read together, these two parts point to a common conclusion: the gap between Bangkok's current practice and a fully rights-based approach to air quality is not primarily a gap in the underlying policy ambition, but in the extent to which that ambition has been translated into legally anchored, verifiable, and participatory governance mechanisms.

This creates a need for a practical instrument that BMA can use to assess its own position against that gap — one grounded simultaneously in the international human rights standards discussed in Section 2.3, the domestic legal and policy baseline mapped in Section 2, and the comparative lessons drawn from Part 3. The self-assessment tool presented in this Part is designed to serve that function: rather than treating human rights integration as a qualitative aspiration, it translates the dimensions identified across the preceding sections into a structured set of questions that BMA can use to identify where its current governance already meets a rights-based standard, and where the most significant gaps remain.

4.1. Methodology

Scoring Criteria and Evaluation Interpretation Guide

The self-assessment questions are based on 4 sets of indicators reflecting the linkages between human rights and urban air quality management:

- ▶ OHCHR's Guidance Framework for creating a Human Rights City, which emphasizes human rights-based urban management across 3 dimensions: Foundations, structures, and tools. These dimensions serve as the framework for evaluating air quality management, aligned with the right to clean air for urban residents.
- ▶ WHO's A human rights-based approach to health, which focuses on providing healthcare services in compliance with human rights principles, particularly mitigating impacts from environments unfavorable to the development of well-being.
- ▶ Economist Impact's Clean Air and the Business and Human Rights Agenda, which highlights the private sector's responsibility in co-creating a healthy environment so that all groups of citizens can achieve a reasonable quality of life and breathe clean air. A key dimension here is industrial emissions control and the polluter-pays principle.
- ▶ The (Draft) Clean Air Management Act, a draft legislation with potential as a tool to address PM2.5 toxic dust issues, embedding principles of public participation and environmental justice across various provisions.

These four sources were combined deliberately because no single existing framework covers the full scope of what a rights-based self-assessment of urban air quality governance requires. The OHCHR–UCLG Guidance Framework supplies the overall architecture — foundations, structures, and tools — for evaluating any Human Rights City initiative, but it is generic to human rights localization and not specific to air quality or health outcomes. WHO's rights-based approach to health narrows that architecture to the health dimension, ensuring the toolkit captures impacts on well-being and access to care rather than treating air quality as a purely environmental metric. Economist Impact's Clean Air and the Business and Human Rights Agenda addresses a gap neither of the above frameworks covers: the private sector's role as both a major pollution source and a duty-bearer, introducing indicators on industrial emissions accountability and the polluter-pays principle.

Finally, the (draft) Clean Air Management Act grounds the toolkit in Thailand's own emerging domestic legal standard, ensuring the self-assessment questions are not only aligned with international norms but also anticipate the obligations BMA is likely to face once the Act is passed. Together, these four sources were also selected to map directly onto the four scoring categories used below: Protection of Fundamental Rights draws primarily on the OHCHR foundations dimension and WHO's health-based approach; Participation and Accessibility of Information and Services draw on OHCHR's structures and tools dimensions together with the draft Act's public participation provisions; and Safety-oriented and structure-based institutional mechanisms draws on all four sources, including Economist Impact's private-sector accountability dimension. Triangulating across these four sources in this way allows the toolkit to assess BMA's performance against international human rights standards, sector-specific guidance, private-sector accountability, and anticipated domestic law simultaneously, rather than relying on any single model that would leave one of these dimensions — or one of the four scoring categories — unexamined.

The authors of this report have defined 3 response levels for respondents, assigning the following scores:

'Yes'	equals 1.0 point
'Partially'	equals 0.5 points
'No'	equals 0 points

The self-assessment consists of 25 questions, meaning the maximum possible score is 25 points and the minimum possible score is 0 points, categorised as follows:

- ▶ Protection of Fundamental Rights of the Citizens (4 questions): Maximum possible score is 4 points.
- ▶ Participation (6 questions): Maximum possible score is 6 points.
- ▶ Accessibility of Information and Services (8 questions): Maximum possible score is 8 points.
- ▶ Safety-oriented and structure-based institutional mechanisms (7 questions): Maximum possible score is 7 points.

Subsequently, the authors established interpretation intervals by calculating the mean score range into 3 levels (Yes, Partially, No) using the following formula:

$$\text{Interval Width for Each Level} = \frac{\text{Maximum Score} - \text{Minimum Score}}{\text{Number of Levels}}$$

Therefore, the interval width for each level is calculated as $(25-0)/3$, which is approximately 8.33. This defines 3 intervals based on city classification tiers. Typically, such city classification relies on population size or functions according to the concept of urban hierarchy. However, this self-assessment uses scores for classification. Based on the aforementioned interval width, the mean score levels are determined as follows:

0.00 – 8.33 points	Indicates an urgent need for improvement	designated as Tier 3
8.34 – 16.67 points	Indicates that human rights issues are becoming established in the city's clean air management process, with readiness for continued implementation	designated as Tier 2
16.68 – 25.00 points	Indicates that human rights issues are institutionalized in the city's clean air management, serving as a best practice model,	designated as Tier 1

Summary Table of Scoring Criteria and Evaluation Interpretation Guide

Tier	Score Range	Success Level	Explanation / Meaning
Tier 1	16.68 – 25.00	High	A model city for human rights-based clean air.
Tier 2	8.34 – 16.67	Medium	A city is transitioning its clean air management to address human rights issues more systematically.
Tier 3	0.00 – 8.33	Low	A city that must urgently accelerate actions to integrate human rights dimensions into clean air management.

4.2. Self-Assessment Tool and the Dimensions Linking Human Rights and Urban Air Quality Management

Evaluation Questions	The Dimensions Linking Human Rights and Urban Air Quality Management			
	OHCHR's Guidance Framework for creating a Human Rights City	WHO's A human rights-based approach to health	Economist Impact's Clean Air and the Business and Human Rights Agenda	(Draft) Clean Air Act
Protection of Citizens' Fundamental Rights 1. Has the right to clean air been legally recognized in the city-level law? 2. Is the right to clean air explicitly recognized in the city's strategic plans or environmental policies? 3. Has the right to access air quality information been legally recognized at the city level? 4. Has the issue of clean air been integrated into the right to health and explicitly incorporated into the city's strategic plans or public health policies?	Human rights-based urban foundations	Non-discrimination and equality	Private sector corporate responsibility regarding human rights	Section 7: An individual's right to clean air shall be protected by law.

Evaluation Questions	The Dimensions Linking Human Rights and Urban Air Quality Management			
	OHCHR's Guidance Framework for creating a Human Rights City	WHO's A human rights-based approach to health	Economist Impact's Clean Air and the Business and Human Rights Agenda	(Draft) Clean Air Act
Open and Regular Participation 5. Does Bangkok have a clean air committee comprising representatives from diverse stakeholder groups, including specific population groups (such as children, older persons, and persons with disabilities)? 6. Does Bangkok have a clean air advisory panel composed of experts from diverse professional fields? 7. Are public consultations conducted prior to the preparation of budgets for air quality management? 8. Does Bangkok regularly organize public forums where officials can directly discuss air quality data with citizens? 9. Is there a formal mechanism allowing civil society organizations to participate in the co-design of Bangkok's air quality action plans? 10. Are training programmes on human rights-based clean air management provided to BMA officials?	Structure	Participation	Community participation	Section 8: In exercising the right to clean air, all citizens shall have the right to form organizations, groups, collectives, or communities, and to participate in state decision-making processes. This includes clean air policy formulation, planning, implementation, monitoring, and performance oversight to ensure adherence to established plans.

Evaluation Questions	The Dimensions Linking Human Rights and Urban Air Quality Management			
	OHCHR's Guidance Framework for creating a Human Rights City	WHO's A human rights-based approach to health	Economist Impact's Clean Air and the Business and Human Rights Agenda	(Draft) Clean Air Act
Accessibility of Information and Services 11. Is real-time air quality information available in both Thai and English? 12. Is there a public health warning system (such as haze or PM2.5 alerts)? 13. Are air quality monitoring stations specifically located in areas with vulnerable populations (such as low-income communities, areas near nursery schools, or elderly care homes)? 14. Are educational and awareness-raising programmes on cities and the right to clean air regularly provided to the public? 15. Is there a call centre allowing the public to report violations or sources of air pollution? 16. Are public satisfaction surveys regarding clean air management conducted regularly, and are the findings incorporated into air quality management planning?	Tools	Comprehensive healthcare service provision	Clean air with poverty, and informal labor	Section 6: The State shall establish environmental management systems to ensure clean air for the public in a serious and effective manner and shall recognize clean air as a fundamental necessity for human life

Evaluation Questions	The Dimensions Linking Human Rights and Urban Air Quality Management			
	OHCHR's Guidance Framework for creating a Human Rights City	WHO's A human rights-based approach to health	Economist Impact's Clean Air and the Business and Human Rights Agenda	(Draft) Clean Air Act
Open and Regular Participation 17. Is free or discounted public transport provided on high-pollution days in order to reduce emissions from private vehicles? 18. Do buildings under the BMA provide air filtration systems as temporary clean-air shelters for the public? 19. Does the city assess the health impacts of air pollution on all population groups, including children and older persons? 20. Have Low Emission Zones been established? 21. Does Bangkok have emergency plans to protect vulnerable groups during severe pollution crises? 22. Is there an Environmental Rights Desk or an equivalent unit responsible for handling complaints relating to air quality? 23. Does Bangkok regularly monitor private-sector compliance with human rights standards relating to clean air and the environment? 24. Are Bangkok's clean air management policies and plans formally incorporated into local ordinances, regulations, or legally binding mechanisms that can continue regardless of changes in political leadership? 25. Is Bangkok's clean air governance subject to an independent external audit?	Structures and Tools	Safe environments conducive to quality of life	Access to complaint and remedy mechanisms	Section 9: The exercise of legal or judicial rights to protect oneself or others from air pollution shall be protected by law.

4.3. Self-Assessment Toolkit for Human Rights-Based Clean Air Governance in Bangkok

Part 1: Protection of Fundamental Rights of the Citizens

1. Has the right to clean air been legally recognized in the city-level laws?
 - ☐ Yes: Explicitly promulgated in the law as an independent category of rights
 - ☐ Partially: Indirectly recognized or acknowledged by analogy
 - ☐ No: Currently not legally recognized
2. Is the right to clean air explicitly recognized in the city's strategic plans or environmental policies?
 - ☐ Yes: Explicitly recognized and defined as a distinct category of human rights
 - ☐ Partially: Indirectly acknowledged (for example, as a public health issue, sustainable development issue, or SDG target)
 - ☐ No: Currently not recognized or included in any official policy
3. Is the right to access to air quality information explicitly recognized in the city's strategic plans or environmental policies?
 - ☐ Yes: Explicitly recognized and defined as a distinct category of human rights
 - ☐ Partially: Indirectly acknowledged (for example, as a public health issue, sustainable development issue, or SDG target)
 - ☐ No: Currently not recognized or included in any official policy
4. Has the issue of clean air been integrated into the right to health and explicitly incorporated into the city's strategic plans or public health policies?
 - ☐ Yes: Fully integrated and defined as a distinct category of human rights
 - ☐ Partially: Partially integrated (for example, identified as a public health issue, sustainable development issue, or SDG target)
 - ☐ No: Currently not recognized or included in any official policy.

Part 2: Participation

5. Does Bangkok have a clean air committee comprising representatives from diverse stakeholder groups, including specific population groups (such as children, older persons, and persons with disabilities)?
 - ☐ Yes: A committee exists with diverse representation
 - ☐ Partially: A committee exists but lacks diversity in representation
 - ☐ No: No such committee exists

6. Does Bangkok have a clean air advisory panel composed of experts from diverse professional fields?
 - ☐ Yes: A multidisciplinary panel exists with adequate oversight powers)
 - ☐ Partially: An ad hoc advisory group exists
 - ☐ No: No advisory panel exists

7. Are public consultations conducted prior to the preparation of budgets for air quality management?
 - ☐ Yes: Participatory budgeting or transparent consultation processes are conducted
 - ☐ Partially: General public hearings are conducted, but not specifically focused on air quality issues
 - ☐ No: Budgetary decisions are made internally without public consultation

8. Does Bangkok regularly organize public forums where officials can directly discuss air quality data with citizens?
 - ☐ Yes: At least twice annually
 - ☐ Partially: Conducted occasionally or only once
 - ☐ No: No direct public discussions on air quality information are conducted

9. Is there a formal mechanism allowing civil society organizations to participate in the co-design of Bangkok's air quality action plans?
 - ☐ Yes: Civil society organizations are formal partners within committees or working groups responsible for plan development
 - ☐ Partially: Civil society organizations are consulted occasionally
 - ☐ No: Plans are developed solely by the BMA

10. Are training programmes on human rights-based clean air management provided to BMA officials?
 - ☐ Yes: Clean air issues form part of mandatory annual training programmes
 - ☐ Partially: Clean air issues are included in voluntary training programmes
 - ☐ No: No training programmes in this area are provided

Part 3: Accessibility of Information and Services

11. Is real-time air quality information available in Thai and English?
 - ☐ Yes: Information is available in Thai and other languages through multiple communication channels
 - ☐ Partially: Information is available only in Thai

- ☐ No: Public access to information remains difficult
12. Is there a public health warning system (such as haze or PM2.5 alerts)?
- ☐ Yes: Real-time warnings are provided through multiple channels free of charge
 - ☐ Partially: Warnings are available through only one communication channel
 - ☐ No: No accessible warning system exists
13. Are air quality monitoring stations specifically located in areas with vulnerable populations (such as low-income communities, areas near nursery schools, or elderly care homes)?
- ☐ Yes: Monitoring stations are specifically located in vulnerable areas to ensure maximum safeguard
 - ☐ Partially: Monitoring stations are located only in general central urban areas
 - ☐ No: Monitoring stations are very limited or insufficient
14. Are educational and awareness-raising programmes on cities and the right to clean air regularly provided to the public?
- ☐ Yes: Educational and training programmes are regularly organized, together with the dissemination of materials on the right to clean air
 - ☐ Partially: No training programmes are provided, but informational materials on the right to clean air are disseminated
 - ☐ No: No such programmes are provided
15. Is there a call centre, allowing the public to report violations or sources of air pollution?
- ☐ Yes: A complaints-handling mechanism exists
 - ☐ Partially: Feasibility studies or pilot preparations are currently underway
 - ☐ No: No complaints-handling mechanism exists
16. Are public satisfaction surveys regarding clean air management conducted regularly, and are the findings incorporated into air quality management planning?
- ☐ Yes: Survey findings are used to improve municipal policies
 - ☐ Partially: General urban satisfaction surveys are conducted, but not specifically on clean air management
 - ☐ No: No monitoring of residents' satisfaction in this area is conducted

17. Is free or discounted public transport provided on high-pollution days in order to reduce emissions from private vehicles?
- ☐ Yes: Free or discounted public transport services are provided throughout the city during designated high-pollution or air quality alert days.
 - ☐ Partially: Public transport discounts are available, but they are not specifically linked to air quality conditions or pollution alerts.
 - ☐ No: No free or discounted public transport services are provided during high-pollution periods.
18. Do buildings under the BMA provide air filtration systems as temporary clean-air shelters for the public?
- ☐ Yes: Multiple designated buildings have been upgraded accordingly
 - ☐ Partially: Air filtration systems exist only in a limited number of pilot buildings
 - ☐ No: No public clean-air shelters with air filtration systems are available

Part 4: Safety-oriented and structure-based institutional mechanisms

19. Does the city assess the health impacts of air pollution on all population groups, including children and older persons?
- ☐ Yes: Disaggregated data are collected annually
 - ☐ Partially: General health statistics are available but are not linked to air quality
 - ☐ No: No monitoring exists regarding the relationship between health and pollution at the local level
20. Have Low Emission Zones been established?
- ☐ Yes: Controlled zones are enforced together with traffic restriction measures
 - ☐ Partially: Controlled zones have been designated but are not strictly enforced
 - ☐ No: No protected zones exist
21. Does Bangkok have emergency plans to protect vulnerable groups during severe pollution crises?
- ☐ Yes: Clear protocols exist and emergency exercises have been conducted accordingly
 - ☐ Partially: General emergency plans exist but do not specifically address air quality
 - ☐ No: No specific plans exist
22. Is there an Environmental Rights Desk or an equivalent unit responsible for handling complaints relating to air quality?
- ☐ Yes: An unit exists with responsibility for environmental rights matters

- ☐ Partially: Suggestion boxes or complaint systems are managed by equivalent teams
 - ☐ No: No such unit exists
23. Does Bangkok regularly monitor private-sector compliance with human rights standards relating to clean air and the environment?
- ☐ Yes: Monitoring is conducted frequently and rigorously
 - ☐ Partially: Monitoring is conducted only on a case-by-case basis following complaints
 - ☐ No: No such monitoring is conducted
24. Are Bangkok's clean air management policies and plans formally incorporated into local ordinances, regulations, or legally binding mechanisms that can continue regardless of changes in political leadership?
- ☐ Yes: Such policies are clearly incorporated into local ordinances or legally binding mechanisms
 - ☐ Partially: Such policies are included in strategic plans or executive policies but are not yet legally binding
 - ☐ No: Such policies depend solely upon the political will of the current administration
25. Is Bangkok's clean air governance subject to an independent external audit?
- ☐ Yes: External bodies, such as civil society organizations, academic institutions, or ombudsman bodies, have formal authority to monitor and report findings
 - ☐ Partially: Internal evaluations exist, but no formal external monitoring mechanism has been established
 - ☐ No: No independent monitoring mechanism exists

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Annex A: Implementation Roadmap

This annex sets out a prioritized, phased implementation roadmap that supports BMA to progressively institutionalize human rights principles in air quality governance and, over time, in other priority sectors. The roadmap synthesizes the findings and outputs of the Verification Workshop on the Self-Assessment Toolkit, held on 14 May 2026 at Four Points by Sheraton, Bangkok, Thailand, and jointly organized by the Raoul Wallenberg Institute of Human Rights and Humanitarian Law (RWI), the BMA, and the Embassy of Australia in Thailand.⁶⁹ It is grounded in Bangkok's declaration as a "Human Rights City" and reflects the workshop's central finding: that Bangkok is transitioning from a needs-based welfare approach to a rights-based framework of governance, under which the BMA is positioned not as a discretionary provider of services but as a duty bearer with corresponding obligations to residents as rights holders.

Actions are organized across three implementation horizons — short-term (0–6 months), medium-term (6–18 months), and long-term (18+ months) — consistent with the horizon structure used by workshop participants during the verification exercise, and each is assigned a priority level (High, Medium, or Low). Priority reflects three considerations set out in the Terms of Reference: (i) the severity of the institutional gap identified during the legal and institutional assessment; (ii) feasibility within the BMA's existing legal mandate and resources; and (iii) direct linkage to one of the five procedural rights areas the assessment is required to address — protection of the rights to life and health, access to environmental information, meaningful public participation, equality and non-discrimination, and access to complaints and effective remedies.

A.1 Short-Term Recommendations (0–6 Months)

The strategic objective of this horizon is to establish immediate, low-cost foundations for rights-based governance using existing institutional capacity, without requiring new budget allocation or legislative change. Given the BMA's existing institutional commitment to the Human Rights City agenda, this phase prioritizes interventions that are procedurally simple, cost-neutral or low-cost, and executable within current departmental mandates.

Priority	Action	Responsible Entity	Expected Output
High	Restructure the city-level Clean Air Committee to formally include civil society representation and publish a short quarterly public note on the Committee's meeting outcomes and priority actions.	Office of the Governor; BMA Environment Department	Revised committee charter with confirmed civil society seats; recurring public accountability note (participation and transparency).

⁶⁹ Raoul Wallenberg Institute of Human Rights and Humanitarian Law, and Bangkok Metropolitan Administration, *Report Insights – Verification Workshop on the Self-Assessment Toolkit for Human Rights-Based Clean Air Management in Bangkok* (Bangkok: Four Points by Sheraton, 14 May 2026).

Priority	Action	Responsible Entity	Expected Output
High	Establish an interim air-quality complaints and inquiry channel by extending the existing Traffic Fondue municipal reporting platform to log and route air-quality-related complaints for response and follow-up.	BMA Environment Department; BMA Digital Government Unit	Functioning interim complaints channel with a defined intake and referral process (access to complaints and remedies).
Medium	Integrate a human rights perspective into internal civil service training curricula, framing air quality management as a rights obligation rather than a discretionary service.	BMA Human Resources / Training Institute	Revised training modules; staff sensitised to the duty-bearer framework.
Medium	Expand English-language localisation of the AirBKK real-time air quality tracking platform (official.airbkk.com) to strengthen inclusive public access to information.	BMA Digital Government Unit	Fully bilingual public information platform (access to information).
Medium	Sustain and formalise the working relationship with the Breathe Council Bangkok (สมาคมหายใจ กทม.).	BMA Environment Department	Documented partnership framework or memorandum of understanding.

A.2 Medium-Term Recommendations (6–18 Months)

The strategic objective of this horizon is to institutionalize the toolkit's findings within the BMA's formal planning and evaluation architecture, and to build the cross-sectoral evidence base and accountability mechanisms needed to target interventions equitably. This phase moves beyond administrative adjustment into structural integration, embedding air quality and human rights indicators — including on non-discrimination and impact on vulnerable groups — into the instruments that govern the BMA's budget cycles and performance evaluation.

Priority	Action	Responsible Entity	Expected Output
High	Integrate clean air targets and public health KPIs (e.g., reduction in respiratory illness incidence) into Phase 4 of the BMA City Development Plan and Strategy, including the addition of an explicit “human rights” category.	BMA Strategy and Evaluation Department; BMA Health Department	Phase 4 Development Plan with quantified, monitorable clean air and public health indicators (right to health).

Priority	Action	Responsible Entity	Expected Output
High	Develop cross-jurisdictional, multilevel medical data-sharing protocols with the Ministry of Public Health and hospitals under other jurisdictions within Bangkok, disaggregated to identify impacts on children, older people, and low-income populations.	BMA Health Department / Medical Service Department; Ministry of Public Health	Shared data protocol enabling disaggregated, equity-focused monitoring of exposure impacts (non-discrimination).
High	Formalise the interim complaints channel into a standing, resourced air-quality redress procedure with defined intake categories, referral pathways, and response-time standards, and establish an independent body (e.g., an academic or civil-society partner) to publicly track BMA's progress against the toolkit's indicators.	BMA Environment Department; Office of the Governor; independent monitoring partner	Standing redress procedure with published response-time standards; independent, publicly reported monitoring arrangement (access to remedies; accountability).
Medium	Formally brief the BMA Strategy and Evaluation Department on the Self-Assessment Toolkit and its findings.	BMA Strategy and Evaluation Department	Toolkit adopted as a recognised internal reference instrument.
Medium	Establish an expert advisory board on air quality governance.	Office of the Governor	Constituted advisory board with defined terms of reference.

A.3 Long-Term Recommendations (18+ Months)

The strategic objective of this horizon is to secure durable, legally binding protections that persist independently of political leadership cycles, and to position Bangkok as a regional reference point for rights-based environmental governance. This phase addresses the workshop's most structurally demanding finding: the current absence of city-level legal mechanisms that bind future administrations to sustain air quality protections, beyond the general authority already provided under national legislation.

Priority	Action	Responsible Entity	Expected Output
High	Draft and pass city-level ordinances binding future administrations to integrated environmental and human rights protocols, including explicit recognition of the right to clean air and a codified complaints and redress mechanism.	BMA Legal Affairs Department; Bangkok Metropolitan Council	Enacted ordinance(s) codifying clean air governance obligations and redress rights.
High	Pursue amendment of, or contribute BMA input to, national legislation — including the Draft Clean Air Management Act — to explicitly incorporate human rights-based air quality governance.	BMA Legal Affairs Department; national legislative counterparts	Amended or newly enacted statutory framework with an explicit human rights basis.
Medium	Advocate inter-agency policy coordination for subsidised or free public transit during acute pollution episodes.	Office of the Governor; central government; private-sector transit operators	Agreed activation protocol for emergency transit subsidy.
Medium	Extend the self-assessment toolkit and governance model piloted for air quality — the Clean Air Committee, the complaints and redress procedure, and the Phase 4 KPI framework — to other priority sectors under BMA's Human Rights City agenda, such as water, waste management, and urban mobility.	Office of the Governor; BMA Strategy and Evaluation Department	Replicable governance model formally extended to at least one additional priority sector, consistent with the toolkit's intended scope.



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