



**To:** Honourable Members of the Legco Panel on Environmental Affairs  
**From:** Alexis Lau, Institute for the Environment, HKUST  
**Date:** November 20, 2006  
**Subject:** Comments on the “Review of Hong Kong’s Air Quality Objectives”

---

## **Air Quality Objectives (AQOs) and the Protection of Public Health**

Air Quality Objectives should and must be set to protect public health.

The World Health Organisation (WHO) has already conducted a comprehensive study, by world renowned experts, using the most up-to-date peer-reviewed research results, including many from Asia and in particular Hong Kong and has arrived at a set of guidelines. It is unlikely that Hong Kong can assemble a better team of experts and come up with a set of guidelines that is significantly different.

Hence, we should not waste time re-inventing the wheel and should adopt the WHO AQGs as our AQOs, as soon as possible.

### **AQOs and Air Pollution Index**

The current Air Pollution Index (API) is derived from the AQOs. Our lax AQOs lead to lower API values, which are in turn misleading for the public as they under-represent the health impacts of the ambient air.

Hence, with or without the revision of AQOs, the API should immediately be revised according to the WHO AQGs.

The public must be better informed (through the API) of the health crisis related to ambient air quality. When the public is better informed, it will be easier to get the stakeholders to accept the cost required for improvement of air quality.

### **AQOs and Environmental Impact Assessment (EIA)**

There are concerns that a substantial tightening of the AQOs will effectively stop all new development projects in HK as EIA approval is currently anchored with the AQOs. We acknowledge this difficulty but first note that the use of verifiable emission offsets could be considered for new projects (similar to the emissions trading scheme). Further, initially, the EIA approval can be modified to anchor with a set of WHO Interim Targets, rather than the WHO AQGs.



The Interim Targets, provided also by the WHO, are to be used “as incremental steps in a progressive reduction of air pollution and are intended for use in areas where pollution is high.” For some pollutants (e.g. PM), multiple interim targets were set.

However, the Interim Targets should not be used as a long-term benchmark. The ultimate benchmark must be the WHO AQGs, and if we adopt the Interim Target(s), we must also have a clear time-table for the EIA anchors to converge to the WHO AQGs.

### **A study to map out a long-term air quality management strategy**

We do not need an 18-month study to revise the AQOs. We should immediately use the WHO AQGs to report API, and adopt the WHO AQGs as our AQOs, as soon as possible.

Tightening our AQOs is just the first step. We do need a comprehensive study to identify control measures, policy options and action items to achieve the AQOs over the long term. Hence, we support a study to map out a long-term air quality management strategy.

The government so far has mainly highlighted the substantial cost for improving air quality, without acknowledging the potentially greater costs to society if air quality fails to improve or continue to deteriorate. The study must also look at and document clearly the tangible and intangible impacts for Hong Kong (and the Pearl River Delta) if we fail to act.

Finally, any action plans to be developed must have a clear time-frame, and be associated with health-based milestones (i.e. achieving specific, lower ambient concentrations targets, rather than reducing emissions on a best endeavour basis). These health-based milestones must ultimately converge to the WHO AQGs.

--

Hong Kong’s development path and our style of living are not sustainable. We must be prepared to go beyond simple control measures for emissions reductions to include planning measures, new policies and life-style changes if we are to achieve better air quality. This can only be done through an informed government and informed society that fully understand the current state of air pollution, its health and economic costs, and the benefits of making fundamental changes.