

**Considerations regarding the setting of
Hong Kong's Air Quality Objectives**

Submission to the Chairman and Honourable members
of the Legco Environmental Affairs Panel

Civic Exchange
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(I) THE ABILITY TO MAKE INFORMED DECISIONS

- Among the most important reasons for having air quality objectives is to serve as indicators of the health risks posed by air pollution.
- If the objectives are not based on scientific evidence of the true health risks, then they mislead the public and policy makers.
- Policy makers and the public need valid information on the health risk so they may better weigh the benefits of action to limit air pollutions against the costs of doing so.
- This includes government policy initiatives to reduce air pollution as well as decisions by individuals about whether to curtail their activities.
- When the level of the objectives does not reflect the best scientific evidence available, this will result in a systematically inefficient response to the problems being faced.
- Government's proposal to wait until 2009 to come up with new objectives (when the scientific basis for them is already available) needlessly prolongs the time in which the public continues to be misled about the true 'costs' of living with our air pollution.

(II) VOLUNTARY VERSUS INVOLUNTARY RISKS

Some argue that we all benefit directly or indirectly from the economic prosperity of Guangdong and so must accept the air pollution imports as a necessary price for those benefits.

This is invalid for at least two reasons.

- First, while some level of pollution is unavoidable in the manufacturing sector, the level of pollution for each dollar of output in Guangdong is far higher than it needs to be. It could be reduced at costs well below the level of the resulting health benefits. In other words, while it is necessary to accept some type of 'bargain' between economic prosperity and air quality, *today we are getting a bad bargain.*
- Second, there is a fundamental distinction between risks voluntarily taken on (e.g., smoking, playing the stock market, engaging in potentially dangerous sports) and those imposed on an unwilling public (e.g., second hand tobacco smoke, insider trading, faulty sports equipment).
 - In the case of voluntary risk, those engaging in the activity accept the risk after weighing for themselves what they see as the benefits and costs.

- In the case of involuntary risks, someone else is making the decision and leaving out of their benefits/cost calculations the impact on the public.

Misleading or weak AQOs tend to cover up the extent of the involuntary risks being imposed on society and keep us from understanding just how bad the bargain we have been handed really is.

(III) CONCLUSION - THE PATH IS CLEAR

- Our conclusion is that the HKSAR Government should make clear that the purpose of setting AQOs is for the protection of public health, and in reviewing how to re-set them, the authorities must use the latest health evidence, which already exists with the World Health Organisation's global air quality guidelines.
- We should set Hong Kong's AQOs at levels that inform rather than mislead the public and policy makers about the costs of failing to reduce air pollution.
- For the purposes of the Environmental Impact Assessment Ordinance's (EIAO) implications for project approval, we should set up Interim Air Quality targets which will be gradually tightened and eventually converge with the health-based AQOs.
- As for what the HKSAR Government can do to improve air quality, we enclose Civic Exchange's comprehensive *Air Management Plan* (September 2006). We also enclose a pamphlet on Hong Kong's Air Quality (August 2006) and a report commissioned by CLSA titled *Boomtown to Gloomtown* (September 2006). We believe the authorities must fight on all fronts to reduce polluting emissions.