



Submission for the “Air Pollution Control (Amendment) Bill 2013” From Clean Air Network

Background

Hong Kong’s existing air quality objectives were established in 1987 and have been in use for over 26 years. In January 2012, the SAR Government announced plans to introduce the “Air Pollution Control (Amendment) Bill 2013” during the Legislative Council 2012 – 2013 session. The Bill was presented in Legislative Council in February 2013 and will receive its first reading next month.

The update of Hong Kong’s air quality objectives is long overdue

In years past, the SAR Government’s environmental protection efforts were extremely sluggish, regardless of whether they were dealing with the issue of air, waste management, environmental conservation or energy. There was a consistent and severe lack of vision on the part of the Government and campaigns often did not go beyond a superficial level to tackle the core causes of the existing issues.

In 2009, the Government launched a public consultation, seeking the public’s opinions on the city’s existing air quality objectives (AQOs). Following this, in 2011, the serving Chief Executive and Secretary for the Environment announced that the AQOs would be updated within the year. However, it was not until 2012 that the Government officially announced a formal plan for executing updates to the AQOs, indicative of just how slow the process has been moving.

Table 1. Record of the serving Chief Executive and Secretary for the Environment’s comments on the AQOs in 2011

Time and location	Setting	Questioner	Response
May 19 th , 2011 Legislative Council	Chief Executive Question and Answer session	Audrey Eu	‘... we are determined to put forward the AQOs for Members’ discussions within this year.’, ‘As I said just now, they will certainly be put forward within this year.’, ‘I have promised you that an announcement will be made within this year.’ - Chief Executive Donald Tsang

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June 8 th , 2011 Legislative Council	Written question	Lee Wing-tat	<p>'The Chief Executive explained at the Question and Answer Session on May 19, 2011 that the new AQOs would be put forward in this year for deliberation by Members. After completing the proposal, we shall consult the Panel on Environmental Affairs of this Council.'</p> <p style="text-align: right;">- Acting Secretary for the Environment, Dr. Kitty Poon</p>
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CY Leung's 2012 campaign platform amounts to nothing

During his campaign in the 2012 Chief Executive Election, Mr. Leung Chun-ying stated:

“To safeguard residents' health, we will adopt the World Health Organization's Air Quality Guidelines as the long-term goal. We will use administrative and legislative means to implement the updating of the short-term Air Quality Objectives recently announced by the government, including the coverage of fine suspended particulates (PM2.5). We will study and set medium and long-term objectives, and further adopt diversified measures to reduce local air pollutant emissions to improve air quality to a level that can meet the new objectives. As well, the Air Quality Objectives will be regularly reviewed and updated.”

Though Mr. Leung said, quite plainly, that administrative and legislative measures to affect better air quality would be undertaken, even now, a year after taking office, there has yet to be any successful action seen from him in this area. CAN believes that swift implementation of new AQOs and measures to meet them is critical to protecting public health.

Government proposals lag too hard behind

CAN welcomes the Government's current willingness to update the old standards, but notes that the new proposed AQOs are far lower than the World Health Organization's (WHO) air quality guidelines (AQGs), and are, in fact, lower than even the air quality standards set by Mainland China.

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Table 2 : Comparison of Hong Kong's AQOs, the World Health Organization's air quality guidelines and China's 2016 air quality standards (number of exceedances noted in brackets)

Pollutant	Averaging time	Existing AQOs ($\mu\text{g}/\text{m}^3$)	New proposed AQOs ($\mu\text{g}/\text{m}^3$)	WHO AQGs ($\mu\text{g}/\text{m}^3$)	China's air quality standards (2016)	
					Grade I	Grade II
Sulphur dioxide (SO_2)	24-hours	350 (1)	125 (3)	20 (3)	50 (n/a)	150 (n/a)
Particulate matter (PM10)	24-hours	180 (1)	100 (9)	50 (3)	50 (n/a)	150 (n/a)
	1 year	55 (n/a)	50 (n/a)	20 (n/a)	40 (n/a)	70 (n/a)
Fine particulate matter (PM2.5)	24-hours	-	75 (9)	25 (9)	35 (n/a)	75 (n/a)
	1 year	-	35 (n/a)	10 (n/a)	15 (n/a)	35 (n/a)
Nitrogen dioxide (NO_2)	1-hour	300 (3)	200 (18)	200 (18)	200 (n/a)	200 (n/a)
Ozone (O_3)	8-hours	-	160 (9)	100 (9)	100 (n/a)	160 (n/a)

Ultimate goal in the foreseeable future

The SAR Government should put into place a timetable and roadmap for adoption of AQOs that match the WHO's air quality guidelines, with a mechanism for review of the objectives every three years (instead of the proposed five years). This way, eventual implementation of the most stringent standards will be ensured. CAN believes that the Government lacks the necessary vision and will to draw up and execute a clear plan for achieving stricter standards, and, therefore, until now, there has been only a very loose review mechanism in place. Given their past performance, the Government's commitment to protecting public health is brought into question.

The health of Hong Kong's residents continues to be threatened

According to the Hedley Environmental Index, over the past few years, there has been an average of 3,000 deaths annually due to air pollution – deaths that the Government has simply stood by and let happen. The pollutant that poses the greatest health threat is fine particulate matter, or PM2.5: fine particulate matter is classified as particulates that have a diameter of 2.5 mm or less, equivalent to 1/40 the diameter of a strand of hair. Its small size allows it to enter deep into a person's lungs and organs, damaging the respiratory and cardiovascular system.

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Although the Government has recommended adding a standard to regulate PM2.5 as part of the new AQOs, the proposed standard for PM2.5 is much more lax than is found in many other Asian countries, even, for instance, a developing country such as Bangladesh. Such a lenient standard will not generate sufficient regulatory pressure to improve air quality and protect public health.

Table 3. PM2.5 Standards for different countries/cities in Asia (micrograms per cubic meter)

Country/City	Averaging time	
	24-hours	1 year
<i>Hong Kong (new proposed AQO)</i>	75	35
Bangladesh	65	15
India	60	40
Mongolia	50	25
Sri Lanka	50	25
Pakistan	35	15
Singapore	35	15

Conclusion and recommendations

CAN agrees with the Government's direction to update the AQOs and urges the Government to expedite the implementation of measures that will improve air quality and protect public health. However, should the objectives be updated, but no further action taken to bring pollutant levels down to meet the new standards, then all efforts to improve the air will be wasted.

To this end, CAN makes several recommendations in order to ensure the most effective improvements in air quality:

1. tightening the air quality standards for various pollutants, especially PM2.5;
2. formulating a clear and specific timetable for adoption of the WHO's air quality guidelines;
3. creating a stricter and more regular review mechanism for Hong Kong's AQOs so that they are re-examined every three years;
4. updating the AQOs as soon as possible and executing effective measures accordingly, to improve air quality.

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CAN urges the SAR Government to seriously consider the recommendations given above, otherwise, the new standards will exist in name only and Hong Kong's residents will continue to suffer needlessly.

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About Clean Air Network

Clean Air Network (CAN) is an independent NGO, founded in July 2009, which aims to educate the public about the health impacts of air pollution. CAN is the #1 NGO exclusively dedicated to the issue of Hong Kong air pollution.

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