

May 24th 2013

Our submission for the “Air Pollution Control (Amendment) Bill 2013”

We welcome the government’s proposal to update the Air Quality Objectives (AQOs). **There must be no further delay in this urgently needed update** since the current AQOs are totally outdated and do not protect public health.

We understand that it is not practical to adopt the World Health Organization’s Air Quality Guidelines (WHO AQGs) as our AQOs at this time because our air quality is also affected by bad regional air quality. That said, **it is even more important for us clean our house and make sure we don’t have loose AQOs for pollutants that are dominated by local sources**; such loose targets will not drive improvement in Hong Kong’s air quality, protect public health, nor show the commitment of Hong Kong to do its part in improving regional air quality.

Studies have shown that our ground-level SO₂ comes mainly from local sources (in particular, emissions from marine shipping). It is unacceptable to have the daily AQO for SO₂ set at the WHO Interim-Target 1 (IT1) level of 125 µg/m³ since EPD’s SO₂ data from recent years show that HK *has already achieved* this loose target. **By adopting the IT1 as target, we are saying implicitly that no further tightening up of SO₂ emission is needed.** This cannot be our message because the same data tells us that our public health is still harmed by SO₂ as our daily SO₂ levels are still higher than the corresponding WHO AQG for SO₂ (20 µg/m³). Hence, **we recommend that the daily AQO for SO₂ should at least be set at the WHO IT2 level of 50 µg/m³.** EPD’s data shows that there were only a few occasions in recent years when this level was breached, and our analysis shows that these cases can be eliminated by tightening fuel / emission requirements of marine sources (e.g. through measures proposed in the 2013 Policy Address). Setting the daily objective for SO₂ at the WHO IT2 level shows that Hong Kong is committed to further improvement in SO₂.

In contrast, for the other pollutants including NO₂, PM₁₀, PM_{2.5} and ozone, our current concentrations are significantly higher than the proposed AQOs (even though most of the proposed AQOs are only WHO Interim-targets). Hence, tightening of the current AQOs to **the proposed AQOs for these other pollutants are at least in the right direction for driving policy actions to further improve air quality in Hong Kong**; we would support them to avoid further delay in the AQO update process.

Nevertheless, our acceptance of the proposed AQOs (that are more relaxed than the WHO AQGs) is contingent on the establishment of **a regular, systematic and open process to review the AQOs**, at least once every five years. We must also make sure **our AQO review process is in par with international best practices**, so that the reviews can truly help drive for further protection of public health.

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