



THE CHINESE UNIVERSITY OF HONG KONG  
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To: Chairman (Bills Committee), Legislative Council

Dear Sir / Madam

**Submission for the “Air Pollution Control (Amendment) Bill 2013”**

I support the government’s proposal to update the Air Quality Objectives (AQOs). The points I wish to make are as follows:

1. The AQOs in current use are more than 20 years out of date. A revised version is urgently required for better protection of public health.
2. The proposed changes are in line with the approach by the World Health Organization (WHO).
3. The choice of the allowable number of exceedances from the proposed AQOs has been made with reference to international practices, such as those adopted by the European Community.
4. While some critics consider the proposed AQOs do not meet the Air Quality Guidelines by the WHO, the latter specifically indicates that countries should formulate their own AQOs in a stepwise manner, taking into consideration the air pollution profile of the country. The approach by the Environmental Protection Department to revise AQOs that take into account the likely outcomes of air pollution control measures, yet with a firm commitment to further revise these AQOs in accordance with the WHO interim guidelines, is a pragmatic one.
5. I note that the EPD has over the past two decades made much progress in the control of sulphur dioxide (SO<sub>2</sub>). Hence I recommend EPD to make a commitment to further tighten the AQO for SO<sub>2</sub> from the WHO Interim Target 1 (the proposed AQO submitted by EPD) to the WHO Interim Target 2 (50 micrograms per cubic meter) in a year’s time. This Interim Target 2 is by no means

unrealistic, and in my opinion, achievable with the continued efforts by EPD to control SO<sub>2</sub> emissions from various sources (including marine emissions from ocean going vessels in particular).

6. While I wish the EPD can set its target higher for PM<sub>2.5</sub>, I understand that we are still some way from achieving the WHO Interim Target 2 of 25 micrograms per cubic meter (annual mean concentration). Hence, I support the proposed WHO Interim Target 1 (35 microgram per cubic meter) as the annual mean concentration for PM<sub>2.5</sub>, but the EPD should actively adopt various control measures to reduce the PM<sub>2.5</sub> concentration so that the next AQO target can be realistically achieved.

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