

18th December, 2018

**AQO Review Coalition opposing EPD's recommendations
on the Air Quality Objectives review**

[For Immediate Release] The Environmental Protection Department (EPD) will announce their recommendations for the second Air Quality Objectives (AQO) review at the AQO Review Working Group meeting today.

In the past two years, EPD has held several public forums in relation to the AQO review. And public opinion has expressed clearly that the review has to prioritize the protection of public health as the key principle. Regrettably, according to the discussion paper from the Air Science & Health Sub-group meeting last Thursday, the EPD recommends merely tinkering with Hong Kong's AQO:

The EPD's Report only recommends **tightening the concentration limits of two types of air pollutants — Sulfur Dioxide (SO₂) and Fine Suspended Particulates (PM_{2.5}) — from the current World Health Organization (WHO) Interim Target 1 to Interim Target 2 ; at the same time, the number of exceedances allowed for PM_{2.5} is advised to be significantly increased from 9 to 35 times.** The Report does not include recommendations on tightening standards of other air pollutants.

Government's suggestion on tightening AQOs:

| Pollutants | Current Level | Suggested Level |
|------------------------------------|----------------------------------|---------------------------------|
| SO ₂ (24-hr average) | 125 µg/m ³ (WHO IT-1) | 50 µg/m ³ (WHO IT-2) |
| PM _{2.5} (annual average) | 35 µg/m ³ (WHO IT-1) | 25 µg/m ³ (WHO IT-2) |
| *PM _{2.5} (24-hr average) | 75 µg/m ³ (WHO IT-1) | 50 µg/m ³ (WHO IT-2) |

*With number of exceedance allowed increased from 9 to 35.

| Air pollutants | Averaging Time | Current HK AQO Concentration limit (µg/m ³) | EPD's recommended HK AQO Concentration limit (µg/m ³) | WHO AQG Concentration limit (µg/m ³) | Difference between EPD's recommended HK AQO and WHO AQG* |
|--|----------------|---|---|--|--|
| Sulfur Dioxide (SO ₂) | 10-minute | 500 | - | 500 | 1 |
| | 24-hour | 125 | 50 | 20 | 2.5 |
| Respirable particulate matter PM ₁₀ | 24-hour | 100 | - | 50 | 2 |
| | Annual | 50 | - | 20 | 2.5 |
| Fine particulate matter PM _{2.5} | 24-hour | 75 | 50 | 25 | 2 |
| | Annual | 35 | 25 | 10 | 2.5 |
| Nitrogen Dioxide (NO ₂) | 1-hour | 200 | - | 200 | 1 |
| | Annual | 40 | - | 40 | 1 |
| Ozone (O ₃) | 8-hour | 160 | - | 100 | 1.6 |



*if the value is 1, it means that the HK AQO complies with WHO Air Quality Guideline (AQG). If the value is greater than 1, it means that the concentration limit of the air pollutant under the HK AQO does not comply with WHO AQO and poses a health risk to the public.

The government projected that the level of SO₂ and PM_{2.5} can achieve the WHO's Interim Target 2 in 2025, thus recommended the tightening of the two pollutants. However, since their projection showed that the concentrations of PM₁₀ and Ozone will not meet the next WHO interim targets in 2025, the EDP recommended no further tightening on the two pollutants.

The AQO Review Coalition expresses strong disappointment towards the recommendations put forward in EPD's Report. We believe the recommendations violate the review principle of "public health first" and the EDP aimed to merely meeting the targets when making the recommendations.

The statutory requirement is to review AQO once every five years. Should the recommendations in EPD's Report be approved, in the coming five years, Hong Kong's AQO will continue to significantly fall short of the safety standards established by WHO. In other words, even the air quality complies with the EPD's recommended AQO, Hong Kong citizens' health will continuously be affected by air pollution, even after this 2nd AQO review.

Mere tinkering with the air pollution policy places citizen's health in danger

WHO has categorized air pollution as public health emergency which affects the entire world. It has also pointed out that air pollution causes seven million premature deaths globally per year. According to the Hedley Index of the University of Hong Kong, air pollution causes about 2,000 premature deaths in Hong Kong per year, and there are on average 5 people dying from air pollution in Hong Kong each day. In the discussion paper from the Sub-group meeting last Thursday, EPD repeatedly used "the impossibility of meeting the target¹" as the reason for refusing to further tighten the AQO in Hong Kong. This evidently shows that the current review is based primarily on technical practicability, rather than policy-making to improve air quality for protecting citizens' health.

EPD views public health as secondary, and has thus clearly ignored the fact that air pollution severely affects citizens' health. If policy-making were done for the sake of citizens' health, we believe that one shall see a more progressive policy framework, including more thorough policies on emission control such as the complete electrification of public transport; and it should also include transport planning which aims to reduce carbon emission and pollution, for instance, establishing large areas of Ultra Low Emission Zone, implementing congestion pricing, and encouraging the use of bikes through planning, etc.

¹ "The 2025 air quality assessment results show that if the AQOs for PM₁₀ and O₃ are to be tightened to the next Interim Target (IT) level, i.e. IT-3 and AQG respectively, the concentrations of PM₁₀ and O₃ in 2025 will not be able to meet the AQOs..."



Public health is at stake. The Hong Kong Government should be bold and decisive, and implement a more progressive policy framework for protecting citizens' health. Mere tinkering with the air policy must stop.

AQO falling short would deprive the vulnerable of a healthy living and exacerbate social inequality

A study conducted by Professor Wong Chit Ming of HKU² clearly shows that, for the socially deprived vulnerable groups who have lower social income and live in a worse environment, not only do they face higher concentration of air pollution than ordinary Hong Kong people, they also face difficulties in maintaining a healthy living due to restrictions of their living environment. It is also difficult for them to resist the health damage brought by air pollution.

Air pollutants in Hong Kong are mainly concentrated in Western Kowloon and Western New Territories, particularly where vulnerable groups live, including the most affected areas, namely Tuen Mun, Sham Shui Po and Kwai Chung. A lagged-behind AQO means depriving the vulnerable of a healthy living and their rights to breathe fresh air. This will in turn exacerbate social inequality.

The **AQO Review Coalition** was established in July 2018; its members include environmental groups, medical organizations, Legislative Council members and lawyers, forming 16 units in total. The AQO Review Coalition petitions that:

1. The Hong Kong AQO be tightened to WHO standards;
2. The AQO Review be based on the protection of citizens' health, and a more progressive policy framework be established on such basis;
3. The air policy includes more thorough policies on emission control, transport planning which aims to reduce carbon emission and pollution.

Coalition member includes:

350HK

Barrister Antonio Da Roza

Chest Delegation HK & Macau

Clean Air Network

Friends of the Earth (HK)

Green Power

Health in Action

Hong Kong Doctors Union

² CM Wong and KP Chan (2003). Social Deprivation, Air Pollution and Mortality in Hong Kong. Report excerpt available at https://www.legco.gov.hk/yr13-14/english/hc/sub_leg/sc03/papers/sc031126cb1-379-7-e.pdf



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Press Release

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Remark : The press release is jointly issued by The AQO Review Coalition formed by 17 groups and LegCo Members' Offices