

Submission to 2025 Air Quality Objectives Review Public Consultation

1. The government proposes to greatly increase the number of exceedances from PM2.5 from 9 times to 35 times a year. According to a research by Prof. Hedley from the School of Public Health at the University of Hong Kong¹, population in Hong Kong would be exposed to an additional 24% health risks every year, if the government were allowed to increase the number of exceedances while tightening the concentration limit of Air Quality Objectives (AQO) of a particular pollutant at the same time.
2. The AQO Review Coalition opposes the government proposal to relax the number of exceedances to 35 times a year for PM2.5. The reason for setting up such number is that the government assumes the level of PM2.5 would exceed the proposed AQO for 33 times in 2025 according to their own estimation. The proposal simply ignores the importance of protecting citizens' health.
3. The government should estimate and release all relevant health risk data to the public related to the exceedance proposal. The public ought to know which scenario will pose a more serious health threat to society – whether an AQO with a higher concentration limit, but with fewer number of exceedances “allowed”, or an AQO with a lower concentration limit, but with much more number of exceedances “allowed”, would be considered a more “worse” AQO that impedes public health.
4. More importantly, the government proposal of increasing exceedances would set a very bad precedence – what is the meaning of reviewing AQOs then, if the standard could be allowed to exceed virtually endless times? If “extreme weather” can be the reason to a greatly increased exceedances “allowed” from 9 times to 35 times, what other reasons do we have to stop the next phase of review from further increasing exceedances “allowed” to, say, 300 times?
5. According to the Air Pollution Control Ordinance (APCO) (Cap. 311) Section 7A, the Secretary for the Environment should review AQO in a way to conserve air quality and promote public interest. How can a proposal with increasing pollution allowed fulfill APCO major objective to “abate, prohibit and control pollution of the atmosphere”?
6. If the emission reduction policy proposed by the government remains effective, the number of times a particular pollutant exceeds AQO should be reduced accordingly. It should be expected that the number of exceedance “allowed” will be decreased after 5 years' time for each review period. To keep the number of exceedance “constant”, or even increasing the number by whatever means, should not be justified from a public health point of view.

¹ Lai, H. K., Wong, C. M., McGhee, S., & Hedley, A. J. (2011). Assessment of the health impacts and economic burden arising from proposed New Air quality objectives in a high pollution environment. The Open Epidemiology Journal.

7. Levels of PM10 and ozone, the two pollutants with AQOs remained unchanged in the government proposal, would be increased by 5.7% and 18% in 2025 respectively², compared to the levels in 2018. The government should tighten the AQOs for the two pollutants and show the willingness to combat air pollution. It is a shame for the government to argue that AQO is not the policy driver for introducing and implementing more radical emission reduction measures.
8. According to the Hedley Index published by HKU School of Public Health, there were 10,106 premature deaths caused by air pollution in Hong Kong in the past 5 years. The air quality in Hong Kong never fulfills the World Health Organization Air Quality Guidelines (WHO AQGs) and seriously impedes citizens' health. The AQO Review Coalition urges the government to tighten AQO to WHO AQGs as soon as possible to ensure public health in the city.

Our requests:

- Withdraw the proposal to increase exceedances to 35 times a year for PM2.5
- Tighten AQOs for PM10 and ozone
- Tighten AQOs to WHO AQGs as soon as possible

AQO Review Coalition

The AQO Review Coalition was established in July 2018; its members include environmental groups, medical organizations, Legislative Council members and lawyers, forming 20 units in total. The AQO Review Coalition petitions that:

1. The Hong Kong AQO should be tightened to WHO standards;
2. The AQO Review should 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.

² Summarized from *Clean Air Plan for Hong Kong 2013-2017 Progress Report* and the paper of AQO Review Working Group Air Science & Health Sub-group for the 6th meeting

Coalition member includes:



The Owners Association of Block 1 of Prosperous Garden

Environmental Concern Group on Central Kowloon Route