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THE CHARTERED INSTITUTION OF  
WATER AND ENVIRONMENTAL MANAGEMENT  
HONG KONG

Our Ref.: L0009032007

Date: 9 March 2007

Advisory Council on the Environment  
40/F, Revenue Tower,  
5 Gloucester Road,  
Hong Kong

(Attn: Professor Lam Kin Che, S.B.S., J.P.)

Dear Professor Lam,

Re: Response to Review of Hong Kong's Air Quality Objectives

With reference to the ACE public forum on Review of Air Quality Objectives held on 18 September 2006, we would like to offer our comments as follows:

**1. Background**

In response to the request from the general public to improve the ambient air quality, the Environmental Protection Department (EPD) has initiated a review of the existing air quality objective (AQO). Advisory Council on the Environment (ACE) held a public forum on 18 September 2006, to collect views from member of the public on the AQO review. The Chartered Institution of Water and Environmental Management Hong Kong (CIWEM HK) would like to express its views on the approach and concern of the AQO review.

**2. CIWEM HK's Views**

The existing AQO was established in 1987. CIWEM HK supports the Government to review the AQO to cope with deterioration of ambient air quality due to the rapid development of Hong Kong society and the economic growth in the Pearl River Delta (PRD) Region in the past 20 years. Recently, the World Health Organization (WHO) has just published the *Air Quality Guidelines*. CIWEM HK agrees that the WHO Air Quality Guidelines is a good reference to the Hong Kong's AQO with incorporation of local elements. It is a suitable time to establish a more representative AQO to protect the health of Hong Kong citizens.

## **2.1 Key Issues of the New AQO**

As advised by the Government, there will be an 18-month review of AQO. According to the Chief Executive's Policy Address made on 18 October 2006, "*The Environmental Protection Department, in light of the World Health Organisation's new guidelines on air quality announced last week, will examine the local situation and come up with suitable targets and strategies for the future*". We consider that a number of essential issues should be considered:

### **2.1.1 Establishment of PM2.5 Objective**

A lot of research has criticized that fine suspended particulates with aerodynamic diameter  $< 2.5 \mu\text{m}$  (PM2.5) are extremely harmful to human health. PM2.5 penetrates the inner part of the respiratory system, acidic and allergic properties of PM2.5 provoke chronic respiratory diseases. In Hong Kong, there is no regular monitoring of PM2.5. CIWEM HK strongly suggests inclusion of PM2.5 in the new AQO, regular monitoring of PM2.5 should be implemented as soon as possible.

### **2.1.2 Protection of the Public Health**

The establishment of AQO is to provide a common guideline for assessing ambient air quality in order to protect the public health from adverse effect of ambient air pollutants. As such, the AQO should be established based on the protection of public health. The AQO should represent the levels of various air pollutants in ambient air which would induce no adverse health impact to the general public.

## **2.2 Approach of the Review of AQO**

More than 100 Hong Kong citizens attended the forum held on 18 September 2006, some of them actively participated in the discussion. This indicates that the review of AQO is a public concern. CIWEM considers that the AQO review should be open, sufficient communication and information should be provided to the general public. The Authority should collect views and suggestions from the public; regular communications with the general public should be arranged.

Review of AQO would involve a lot of information from scientific research and past ambient air quality monitoring data. The Authority should establish a framework on how the review to be carried out with sufficient scientific background, so that the health impacts of the air quality can be accurately assessed.

## 2.3 Participation of Professionals and the Public

It is obvious that the review of AQO is an important environmental issue of the Hong Kong Society. CIWEM HK considers the participation of environmental professionals (e.g. academia, industry stakeholders, professional bodies, etc.) and the general public at different stages of the review is important so as to enhance the representativeness and participation of the whole exercise.

### 2.3.1 Involvement of Professionals

The AQO review should involve local environmental and health-related professional bodies. CIWEM HK suggests a technical committee with representatives from government, academia, industry stakeholders, local professional bodies, etc, should be formed to enhance communication and technical information exchange. Regular meetings are meaningful to collect view and suggestions from members such that the review would be more representative.

### 2.3.2 Communication with the General Public

In order to enhance public participation, regular communication with the general public should be arranged so as to update our fellow citizens about the progress of the review. CIWEM HK suggests regular public forums and brief progress reports are effective means of public communication. The Authority may collect views and suggestions from the public through open communications.

Should you have any queries on the above comments, please do not hesitate to contact the undersigned at 2788 5647, email: [kenny@hkpc.org](mailto:kenny@hkpc.org) or Ms Philomena Lau at 2788 5367, email: [philomena@hkpc.org](mailto:philomena@hkpc.org).

Yours sincerely,



Kenny Wong  
Chairman, CIWEM HK