



Submission for the Air Quality Objectives Review Public Consultation

Since the launch of the Consultation Paper in July 2009 our members have discussed the issue in great detail. We are certainly encouraged by the Government's long-term commitment to adopt, in phases, the World Health Organization (WHO) Air Quality Guidelines. The decision to implement the WHO Air Quality Guidelines has reinforced Hong Kong's environmental efforts over the past years. As a representative of the Hong Kong Construction Industry, we applaud the Government's intention but we would like to add a few words of caution to the Administration Department.

The current Air Quality Objectives (AQO) were established in 1987 and as far as we are aware up to now, Hong Kong has difficulty in meeting these targets largely due to drifting air pollutants from Southern China. We therefore strongly urge the Environment Bureau to consider modifying the Proposed Intermediate Air Quality Objectives in light of Hong Kong's prevailing local conditions.

The Proposed Intermediate Air Quality Objectives should be achievable and also provide indications to the general public of our efforts in combating the air pollution problems. Currently our efforts are simply overwhelmed by the background tainted air streams and the Proposed Intermediate Objectives should consist of the following characteristics;

1) Attainable and Meaningful

The WHO Air Quality Guidelines should be consulted as a general reference in setting up of the Hong Kong Air Quality Objectives. The WHO Guidelines should only be enforced when the background indices caused by imported pollutants fall below the WHO Standards. The current measured data should be used in conjunction with scientific proven air quality models with the 19 proposed improvement measures in predicating outcomes of air quality in Hong Kong.

2) Local Air Quality Indicators and Background Tainted Air Indices

The Proposed Objectives should be split into local indicators and background indices. The local and the regional air conditions should be monitored and analysed separately. These indicators would provide variable information to the general public on the efforts we have made in controlling the pollutants that generate within Hong Kong.

3) Endorsement by the Effected Industries

The nineteen proposed measures lacked sufficient details and we recommend the affected industries should be fully consulted in advance prior to any implementation of these measures.

We sincerely hope that our views could assist in drawing up a meaningful Air Quality Objectives for Hong Kong and you could always count on HKCA in putting forward suggestions to ensure Hong Kong to become a better place for all of us.

The Hong Kong Construction Association, Ltd.
Nov. 2009