



香港社會醫學學院
HONG KONG COLLEGE OF COMMUNITY MEDICINE
founder College of the Hong Kong Academy of Medicine
Incorporated with limited liability



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By Post and Email

COUNCIL 2008-09

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Director
Environmental Protection Department
33/F-34/F & 46/F-48/F Revenue Tower
5 Gloucester Road
Wan Chai
Hong Kong

24 November 2009

Dear Ms Anissa Wong,

Air Quality Objectives (AQOs) Review – Public Consultation

On behalf of the Hong Kong College of Community Medicine (the College), I would like to submit our views and comments on the captioned review (the Review).

The College, as a professional organisation consisting of specialist doctors working to protect, promote and improve the health of community, considers that the Hong Kong Government should take immediate and energetic steps to implement effective measures for the improvement of the quality of Hong Kong air and reduce its impact, where the exposure prevalence approximates to 100% and everyone is potentially at risk.

We are of the view that the health impacts of current poor air quality and the public health benefits of improving air quality have not been scrutinised and informed to the public explicitly in the Review. In fact, they should be the cornerstone. Regarding local examples of health impacts, you may wish to refer to our previous letter dated 19 March 2008 to the Director of Environmental Protection.

Besides, there is emerging evidence of inequities among the population in adverse health effects due to air pollution. Environmental equity will need to be balanced with other societal concerns in reaching policy decision that maximize health benefits in the context of economic constraints. Actually, the air quality in



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Hong Kong is of political, economic and social significance. Community health researches do benefit the development of evidence-based and social-accepted air quality management policy.

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Although we welcome the proposed emission control measures in the Review, the Government can certainly act more. Actually, the proposed AQOs should not be set based on the feasibility of achieving the proposed control measures and should primarily be set according to essential health protection and benefits.

Finally, we would like to highlight that there are no "safe" levels for most air pollutants whereby no health effects are observed following exposure. Simply meeting the proposed or even much stringent AQOs is not enough, and the goals of air quality management should be to reduce and minimize the associated health risks continuously. Periodic evaluation and assessment for the air quality management policy with the support of relevant researches are recommended.

Yours sincerely,

Dr Mandy Ho
Honorary Secretary
Hong Kong College of Community Medicine