

Appendix 1 - WWF's 2018-2019 Policy Address recommendations

**WWF's Recommendations for the 2018-19 Policy Address –
Transform Hong Kong into Asia's Most Sustainable City**





SUMMARY

1. Brownfield development must be prioritized to safeguard our green spaces

The government to take initiative to analyze land utilization in Hong Kong, focusing on brownfields and vacant land and formulate development plans to meet housing and other needs without threatening sites of ecological and conservation importance. Our country parks should continue to be fully protected to both preserve and manage their ecological value and make them accessible for the enjoyment of the public and overseas visitors. We would support resources being made available to support responsible guided eco visits that better connect our community to nature with subsidies being made available to provide eco guide training to both young people and retirees.

2. Marine spatial planning needs to be conducted prior to any reclamation

Reclamation should only be considered as a last resort in enhancing land supply, and the government should immediately conduct a coastal and marine spatial planning exercise, aiming to strike a balance to first protect and provide resources to restore areas of marine conservation priority before starting further reclamation based development.

3. 10% of Hong Kong waters committed as marine protected areas (MPAs) by 2020 and 30% designated by 2030, with commercial fishing excluded from three existing marine parks

Resources should be allocated to assess the threats in conservation priority sites, identify stakeholders and conduct feasibility studies for establishment of marine protected areas (MPAs) with specific conservation measures to protect vulnerable habitats and species.

4. Treat wildlife crime as a serious crime

Hong Kong's wildlife crime offences should be included under Schedule 1 of the Organized and Serious Crimes Ordinance (OSCO) to further deter transnational criminal enterprises who use Hong Kong as a route for wildlife smuggling. The government must strictly implement CITES, ensuring that the relevant regulations are effectively and comprehensively enforced at port and at business level.

5. Tackle marine litter and regulate single-use plastics

Significantly reduce Hong Kong's marine litter by waste reduction at source including innovative waste interception measures, regulating single-use plastic products in the food and beverage industry.

6. Establish a Conservation Trust

A statutory trust independent from the government should be established, the legal and institutional basis for the trust should be supported by an ordinance.

7. Establish a 10% renewable energy target for 2030 and facilitate building energy efficiency

The government needs to set a more aggressive target for renewable energy (RE) of 10% by 2030 and strengthen policy to enhance building energy efficiency, with the support of green financing.



WWF Hong Kong recommends the following policies for consideration and adoption by Chief Executive Mrs Carrie Lam in her second Policy Address, to help transform Hong Kong into Asia's most sustainable city:

1. Brownfield development must be prioritized to safeguard our green spaces

Holistic town planning and sensible land policy can help to strike a balance between conservation and social needs, maintaining both green spaces and urban development. We urge the government to adopt “brown-fields first” policy¹ to make use of available areas rather than considering rezoning green belts with ecological value. We strongly reject any attempt to develop country parks. Our country parks should continue to be fully protected to both preserve and manage their ecological value and make them accessible for the enjoyment of the public and overseas visitors. We would support resources being made available to support responsible guided eco visits that better connect our community to nature with subsidies being made available to provide eco guide training to both young people and retirees. In planning and land policy we recommend;

- a) The Town Planning Board should reinstate its role to disapprove unsuitable brownfield applications. No applications for new brownfields should be accepted and enforcement on all unauthorized use of brownfields should be strengthened to prevent further expansion.
- b) Speed up the resumption of brownfield sites and devise a fair compensation mechanism for planned development projects.
- c) Establish an open and comprehensive land database to enhance transparency in decision making and facilitate holistic urban planning.
- d) Identify unprotected areas of high ecological value which should remain “development free” and assign them permanent protection by incorporating them into the country park and Site of Special Scientific Interest (SSSI) systems.

2. Marine spatial planning needs to be conducted prior to any development of reclamation

The sea is an important and precious resource, and should be carefully managed to conserve biodiversity, and support fisheries, human activities and a high quality of life. A healthy sea provides a wealth of benefits to Hong Kong

¹ <https://www.wwf.org.hk/en/?21121/No-need-to-pave-paradise-1200-hectares-for-Hong-Kong-housing-is-available-right-now>

communities. WWF objects to marine reclamation for the purpose of building land reserves before fully exhausting other options and regards reclamation as a last resort².

Land use planning has been practiced for decades to ensure its proper use, making reference to environment, habitat types and conservation values; however, there is no similar practice for the sea. In order to better conserve our valuable marine environment and at the same time cater for growing human usage and future development, the government should immediately conduct a coastal and marine spatial planning exercise, aiming to strike a balance to first protect and provide resources to restore areas of marine conservation priority before starting further reclamation based development.

Such coastal and marine spatial planning typically involves a baseline assessment, which helps determine corresponding compatible/incompatible uses; identify areas requiring protection; as well as finding areas that will incur the least impact from development or heavy use. It is a critical management tool for achieving sustainable development and should be done prior to any development of reclamation plan.

3. 10% of Hong Kong waters committed as marine protected areas (MPAs) by 2020 and 30% designated by 2030, with commercial fishing excluded from three existing marine parks

With only 5% of Hong Kong's waters designated or planned as marine protected areas (MPA), including marine parks and marine reserve by 2023, this is simply not enough! The Government needs to show real commitment to speed up protection of seven areas of conservation priority identified by scientists with WWF. There has been inaction for too long and there is now an urgent need and opportunity to protect the existing marine life and habitats from the increasing threats they face. Action to date has been inadequate to help our depleted marine ecosystems recover. In 2018, WWF has identified seven conservation priority sites in Hong Kong, to make our valuable marine habitats and species more resilient to human disturbance and climate change. WWF urges the government targets to:

- a) protect and conserve at least 30% of waters in Hong Kong effectively by 2030³. At the very least commit to an interim target with 10% marine protected areas by 2020. Resources should be allocated to assess the threats, identify stakeholders and conduct feasibility studies for the establishment of MPAs⁴ with specific conservation measures to protect

² <https://www.wwf.org.hk/en/news/featuredstories/?21120/cost-of-reclamation>

³ https://www.wwf.org.hk/en/mpa_petition.cfm

⁴ <https://apps.wwf.org.hk/hotspot-map/map-en.html>



vulnerable habitats and species. A co-management approach with local communities, academics, fishermen and village leaders should also be considered to achieve best results. The following areas are considered with top priority for immediate action from the government:

- West Lantau – the remaining core habitat of Chinese white dolphin in local waters. Offshore waters of Yi O and Tai O should be designated as an MPA, linking current and future marine parks to create a protected corridor for Chinese white dolphins and to help fisheries recovery.
 - Shui Hau – the mangroves and intertidal mudflat supports high biodiversity and serve as an important spawning and nursery ground for horseshoe crabs.
 - Sham Wan – the only remaining nesting site regularly used by green turtles in Hong Kong, crucial to their population in South China.
- b) offer a nursery and resting space for vulnerable habitats and species, with commercial fishing banned in the three existing marine parks in the eastern waters (i.e. Tung Ping Chau, Hoi Ha Wan and Yan Chau Tong). The government should allocate more resources to conduct habitat restoration projects with academics and conservation organisations, particularly coral rescue and restoration at Hoi Ha Wan. Resources are also needed to promote the proper surveillance and enforcement of MPAs to combat illegal fishing activities and ensure the fisheries resources can recover without unexpected disturbance. A well-managed MPA will support the livelihoods of people relying on the marine resources, eventually helping to achieve long-term ecological, social and economic objectives.
- c) formulate specific objectives for fisheries protection areas (FPAs). The types of controls on fishing that will be employed within an FPA must be prescribed together with the FPA boundaries. The designation of FPAs has been mooted by the administration for many years, and is the primary measure put forward under Sustainable Fisheries in the BSAP (Action 11). While FPAs are potentially an important tool to facilitate recovery of the local fisheries by protecting important fishery and nursery areas, many doubts remain, and specific objectives and measures are required to ensure effectiveness.

4. Treat wildlife crime as a serious crime

In recent years, the illegal wildlife trade has exploded globally to meet the increasing demand for rare animal products. Over 20,000 elephants are poached every year to meet the demand for ivory products in Asia, particularly for China and Thailand; of which Hong Kong is a major transit hub as well as one of the world's largest ivory retail markets. Hong Kong also accounts for

about 40% of the global shark fin trade. With more shark species being protected nationally and internationally, tackling illegally sourced or traded shark fin products is becoming an increasing challenge. According to the government, there were 22 shark fin seizures between 2013 and 2017 without any prosecution.

WWF puts strong emphasis on combating wildlife crime and applauds the government's recent action to raise the maximum penalty for offences relating to scheduled species, and this regulation should be dovetailed with strong enforcement. To further deter transnational criminal enterprises from using Hong Kong as a popular route for wildlife smuggling, Hong Kong's wildlife crime offences should be included under Schedule 1 of the Organized and Serious Crimes Ordinance (OSCO). It is known that wildlife criminal enterprises operate through international criminal syndicates. Additional investigative powers under OSCO enable investigations such as money laundering on wildlife crime, regardless whether the offence is within boundaries of Hong Kong.

In the long term, the government should tackle criminal enterprises as a whole instead of focusing solely on smugglers, who have less influence in the criminal enterprises. Security Bureau should recognise the threat to security posed by wildlife crime enterprises and needs to now take over the lead policy role on wildlife crime and set up a joint task force with law enforcement agencies and AFCD. A joined up effort is needed if we are to stop transnational wildlife crime.

The government should through the Hong Kong Police Force's Crime and Security Department and Liaison Bureau strengthen communications with source countries of wildlife products (e.g. shark fin) to develop criminal intelligence on wildlife transnational crime syndicates. A joint task force should be designated to keep abreast of relevant national regulations, beyond CITES, in relation to sourcing and trading of wildlife products and to gather and disseminate information. Intelligence analysis and resources tasking are needed to identify and take action on illegally sourced, exported or re-exported products such as shark fin. WWF and TRAFFIC can assist a local law enforcement task force and the relevant overseas agencies.

Special attention should be paid while implementing CITES by the government departments, ensuring the relevant regulations are effectively and comprehensively enforced at port and at business level. AFCD's current procedures for monitoring pre-CITES ivory (an Appendix I listed species and therefore subject to tighter controls) should be stepped up to prevent illegally imported ivory from hiding inside the pre-CITES ivory stockpile. WWF also registers grave concern about shark fin, as several large seizures of illegally imported CITES Appendix II listed fins have been made in Hong Kong, indicating that some traders circumvent CITES regulations, either at port level



(import without permit) or at business level (hide amongst legal stockpile). If this situation persists, the government may be left with little option but to ban the imports of CITES Appendix II listed shark fin and require traders to divest their stocks within a defined period of time.

5. Tackle marine litter and regulate single-use plastics

The problem of marine litter has been a persistent environmental issue in Hong Kong for decades and worsens every year. Litter appears along the shoreline, floats on the water's surface and sinks to the seabed. This affects our marine ecology in many ways, and needs to be comprehensively tackled. The government should implement the following strategies:

- a) allocate more resources to investigate and implement innovative measures to tackle the sources of marine litter under the Inter-Departmental Working Group on Clean Shorelines, including intercepting litter from storm drains and rivers using floating refuse booms. This is in line with the report released by EPD in 2015, which suggests improvement measures include prioritizing strategies to “reduce overall waste generation at source” and “reduce the amount of refuse entering the marine environment”, instead of mainly focusing on “removing refuse from the marine environment”.
- b) regulate single-use plastic bottle products in the food and beverage industry through a charging scheme and setting a clear timeline to phase out these products. Single-use plastic cutlery, straws, food containers and plastic bags from this industry are some of the most frequently encountered marine litter types in Hong Kong. There is a global movement for the governments to regulate a ban and phase out these single-use products, and Hong Kong needs to catch up this global effort and announce a timeline for a ban.
- c) implement a product material labeling system to facilitate recycling and waste treatment, and foster simpler and greener product design to reduce waste generation in the long run. Modern day materials for products and packaging are complex – some are recyclable, biodegradable or require special treatment like industrial composting. Currently Hong Kong's recycling is dysfunctional and there is no regulation on labeling of materials, which contributes to failures in sorting waste for recycling or proper treatment in Hong Kong. We propose simple product material labeling to list the materials in the products and their packaging and provide information for better local recycling. This can facilitate some waste reduction and promote a circular economy, but ultimately we believe to make any real headway and have any impact on the vast quantity of single-use plastic waste entering our oceans we urgently need regulation on plastic bottle products and other single-use plastics. Plastics never go

away and they are neither disposable nor decompose. They have limited value in recycling and we need to debunk the myths surrounding plastic and face up to the dysfunction in our city's recycling programmes.

6. Establish a Conservation Trust

Private land with high ecological value, in principle, should be zoned for conservation purposes; however, in practice it is often difficult to realize the conservation potentials. Conflict between conservation needs and property rights of landowners is intensifying; yet existing conservation mechanisms are inadequate to resolve this. In the Inner Deep Bay wetlands, many of the fish ponds are owned by private developers and development is permitted under the current Public-Private Partnership (PPP) scheme, but PPP alone is ineffective from a conservation perspective.

Proactive intervention is needed to ensure these wetlands are protected and managed to optimize their conservation value. WWF strongly advocates a Conservation Trust – to safeguard and finance the long-term holistic biodiversity management of important sites.

WWF believes the Conservation Trust should:

- a) be an independent statutory trust, similar to the National Trust in UK or Noosa Biosphere Reserve Foundation in Australia. The legal basis for the trust should be supported by the government and community.
- b) have a clear goal and a credible governance structure. The trust can buy, receive, hold and manage sites of high conservation value.
- c) have a dedicated team to look after the different actively managed wetlands, to increase efficiency and ensure collaboration.
- d) secure funding from a variety of sources including revenue under PPP projects, donations, land sales, and government funds.

7. Establish 10% renewable energy target for 2030 and facilitate building energy efficiency

To ensure Hong Kong can meet its obligations under the Paris Climate Agreement as one of the most developed cities in the region, it is essential that the government set up a more aggressive target for renewable energy (RE) of 10%⁵ by 2030. Buildings account for over 60% of greenhouse gas emission locally, and to curb our demand for fossil fuels, progressive and long-term

⁵ https://d3q9070b7kewus.cloudfront.net/downloads/Hong_Kong's_Renewable_Resource_Base_FINAL2.pdf



building energy efficiency improvements should be committed and thoroughly executed⁶. To achieve these objectives, the Hong Kong government should:

- a) make a public undertaking that it will make efforts to negotiate with future electricity utilities to ensure that feed-in tariff (FiT) will last for 20 years at the same rate commencing from the date of acceptance of the RE installation into the power grid and act as a backstop if negotiations are not fruitful.
- b) amend the building regulations regarding the legality of a canopy of solar panels by issuing clear guidelines to remove uncertainties and to amend relevant restrictions.
- c) use public open space to further recognising local RE potentials through releasing smaller sites such as those at public parks or public housing estates for RE installations by social business incorporated or invested by local communities, and to open up larger ones for companies to bid for the right to install and operate solar farms.
- d) provide additional funding support to community projects, such as RE installations at facilities run by NGOs, social business incorporated by local residents, or professional training for RE installers.
- e) set out clear guidelines on FiT level for large installations, including renewable energy sources other than solar and small scale wind power.

Further, to better align its incentives and policy in promoting green buildings, we recommend the government to link gross floor area (GFA) concession with BEAM Plus rating attainment; with 2% for bronze, 6% for silver, 8% for gold and 10% for platinum. Also to emphasize and incentivize building energy efficient designs, GFA concessions should also require attainment of specific targets set and under indicators EU1, EU2 and EU13 under BEAM Plus for New Buildings⁷.

WWF applauds the government's HK\$100 billion Green Bond Programme, which would stimulate green finance development in Hong Kong, encourage issuers to arrange financing green project through local capital markets. We urge the public works projects under the Green Bond Programme to be scrutinized in addressing climate change challenges such as near zero-carbon design, foster innovation and truly transform Hong Kong into Asia's most sustainable city.

⁶ https://d3q9070b7kewus.cloudfront.net/downloads/hong_kong_energy_vision_2050_english_version_20150714.pdf
⁷ <https://www.beamsociety.org.hk/files/download/download-20130724174420.pdf>