



世界自然基金會
香港分會

WWF-Hong Kong

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Chairman and Members of Panel on Health Services
Subcommittee on Issues Relating to the Development of Chinese Medicine
Legislative Council
(c/o Clerk to Panel on Health Services, Subcommittee on Issues Relating to the
Development of Chinese Medicine)
Legislative Council Complex, 1 Legislative Council Road
Hong Kong

18 February 2020
(By post and e-mail)

Dear Sir/Madam,

**Re: Panel on Health Services Subcommittee on Issues Relating to the Development
of Chinese Medicine Meeting on 24 February 2020 agenda item I
“Development of Chinese medicine”**

We understand the above captioned will be discussed during the meeting of the Panel on Health Services Subcommittee on Issues Relating to the Development of Chinese Medicine on 24 February 2020. To ensure traditional Chinese medicine (TCM) can be used for future generations, WWF stresses the importance of the protection and sustainable use of medicinal resources.

TCM is one of the world's oldest medical systems that has gained in popularity and prestige worldwide. However, the use of some medicinal ingredients has led to an ongoing depletion of a variety of animals and plants, including wild ginseng, pangolin, tigers, rhinoceros, musk deer, and Saiga antelope. Although some of the trade in these and other wild species is legal, poaching persists and the illegal trade in endangered species is currently a major threat to many medicinal plant and animal species.

The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) has recently stressed the unprecedented rate of biodiversity loss, suggesting that approximately 1 million species are facing risk of extinction, with overexploitation being one of the biggest direct threats. Nevertheless, millions of plants and animals are caught or harvested from the wild for the usage of producing TCM every year. Illegal trade in wildlife and wildlife parts for use in TCM drives intensive and widespread poaching and harvesting that has caused major declines in species populations in the wild, with many species close to extinction.

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WWF addresses the illegal and unsustainable wildlife trade for TCM should be regarded as a major issue of concern in the development of the TCM in Hong Kong. A precautionary approach is needed that recognizes the impacts of the trade in wildlife parts for the TCM on wild species populations and ensures that appropriate safeguards are put in place and enforced to protect species in the wild so that they can sustain populations throughout their range and maintain their key ecological roles. Hong Kong has responsibilities under the United Nations Convention on Biological Diversity (CBD), whereby signatories must ‘ensure that activities within their jurisdiction or control do not cause damage to the environment of other States or of areas beyond the limits of national jurisdiction’. We suggest the following measures in order to sustainably develop TCM and be in compliance with the CBD article 3 principle:

1. Include wildlife offences under Schedule 1 of the Organized and Serious Crimes Ordinance (OSCO)

Hong Kong remains notorious as a global hub for illegal wildlife trafficking. Between 2013 and 2018, wildlife products with an estimated value of HK\$633 million were seized in Hong Kong. These include ivory, pangolin scales, and rhino horns, potentially equal to the slaughter of 3,200 elephants, 101,000 pangolins and 62 rhinoceros. Pangolin scale, rhino horn tiger and lion bone, seahorses, and saiga horns, for example, are used in TCM. According to a report by the International Union for Conservation of Nature (IUCN), high volume trafficking of pangolin and pangolin scales is driven by demand from the TCM market in China. Along with the development of the “Belt and Road” and the “Greater Bay Area” initiatives, Hong Kong’s role as a transshipment hub means that it can play a leading role in deterring illegal wildlife trafficking. WWF urges the government to immediately capture relevant Cap 586 offences (e.g. under section s5-9 and s11-15) under Schedule 1 of the Organized and Serious Crimes Ordinance Cap. 455 (OSCO) to further deter illegal wildlife trade. Illegal wildlife trade is associated with well-organized, global syndicates. Organized crime runs the illegal wildlife trade and this should be addressed and recognized through considering illegal wildlife trade offences under OSCO. Failure to do so could attract international censure and marginalization for not taking the necessary steps to address the trafficking and trade in wildlife, especially with the proven links to frequent zoonotic pandemics that have huge global economic and social costs that run into Billions of dollars.

2. Enhance TCM drug labelling and increase prescription transparency

A survey from TRAFFIC East Asia indicates a large proportion of the general public supports the use of TCM that is sustainably sourced and supports the banning of TCM derived from endangered species. In this regard, WWF suggests the Chinese Medicines Industry Subcommittee to introduce a labelling system for proprietary Chinese medicines to include the scientific name, origin, production method, and International Union for Conservation of Nature (IUCN) Red List status of any threatened species. Patients should be given a right to choose a sustainably-sourced option of prescription. TCM practitioners should also inform patients if any threatened species is prescribed,

seek for consent, and provide sustainable alternatives. TCM practitioners should avoid using, recommending, or prescribing any products derived from threatened wildlife species or plants.

3. Advocate the sustainable use of TCM among the public and Chinese medicine practitioners

Government plans to invest 500 million in promoting the development of TCM. WWF strongly suggests the concepts of “sustainability”, precautionary approaches to impacts on wild species, and best practices for responsible TCM sourcing be incorporated into education programmes of The Industry Support Programme under the Chinese Medicine Development Fund (CMDf). Scientific research projects on the substitutions for parts of threatened species should be carried out by the Chinese Medicine Development Committee. The CMDf can also launch an open accessible digitized platform providing location of sustainable TCM practitioners and background information of TCM ingredients such as IUCN Red List status of the wildlife species. The Chinese Medicine Council of Hong Kong should work with the Insurance Authority in further reducing the demand for using threatened species in TCM. Any species listed under cap 586 (Including appendix I, II, III species) should not be eligible for medical insurance reimbursement. TCM students and practitioners should take the IUCN Red List of Threatened Species into account, prescribe TCM derived only from non-threatened and sustainably harvested wildlife species.

We believe that the above recommendations are essential for Hong Kong to ensure TCM can be used for future generations and threatened wildlife species recover in the wild. We hope to see Hong Kong become one of Asia’s most sustainable and liveable cities that we will all be proud of.

Yours faithfully,



David Olson, PhD
Director of Conservation
WWF-Hong Kong

Encl. WWF Recommendations for 2019 Policy Address

c.c. Secretary for the Environment, Wong Kam-sing, GBS, JP
Secretary for Food and Health, Professor Sophia Chan, JP