



40 YEARS
OF ACTION FOR NATURE

世界自然基金會
香港分會

WWF-Hong Kong

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Chairman and Members of Panel on Environmental Affairs, Legislative Council

(c/o Clerk to Panel on Environmental Affairs)

Legislative Council Complex,
1 Legislative Council Road, Central, Hong Kong

9 February 2022
(By post and e-mail)

Dear Sir/Madam,

WWF's suggestion for Panel on Environmental Affairs Year 2022 discussion topics

WWF-Hong Kong (WWF) congratulates Hon Elizabeth Quat on her appointment as chairman of the Panel. We believe the Panel plays an important role in helping Hong Kong to form a [holistic conservation policy](#), with the goal of transforming society's relationship with biodiversity, that benefits both nature and the people of Hong Kong. In this regard, we have the following suggestions for 2022's panel discussion:

1. Sustainable seafood labelling

The per-capita seafood consumption in Hong Kong is the 2nd highest in Asia, and the 8th highest in the world. Nearly 90% of the seafood we consume is imported from more than 170 countries. The seafood supply chain in Hong Kong is untransparent and complex with loose regulations to monitor the procurement process. WWF recommends the government to **mandate seafood health certificate for importers and tighten the product labelling law**. Retailers and restaurants must state all three information when they sell seafood, namely seafood species name, origin, and production method. Aspiring to be a smart city, Hong Kong should establish a digital system, such as blockchain, to ensure seafood traceability and transparency. Government must provide necessary support and training to the industry.

2. Ivory ban loophole

On December 31, 2021, Hong Kong has at last officially banned the sale of elephant ivory. The commercial possession of all elephant ivory, except antique ivory and ivory look alike products such as mammoth ivory, is now completely banned. For most people who lack proper equipment and relevant knowledge, it is impossible to distinguish antique ivory and mammoth ivory from illegal elephant ivory. AFCD is conducting inspections in antique and ivory shops these days and has seized some alleged antique ivory products with no proof. WWF urges the government to **ban antique ivory and mammoth ivory trade** to mitigate the risk of laundering illegal elephant ivory products.

3. Review Biodiversity Strategy and Action Plan 2016-21

It is time for the government to review BSAP's conservation impact and its effectiveness before setting a new plan. The next BSAP should apply a participatory approach to implementation, while setting a target to achieve a nature-positive Hong Kong by 2030. WWF urges the government to **publish a biodiversity indicator report** on a regular basis, with associated obligations in response to any indications of biodiversity loss. The government must formalise the procedures for conducting Strategic Environmental Assessments to incorporate principles of the Convention on Biological Diversity.

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4. **Kickstart Marine Spatial Planning with a goal of managing 30% of our waters as Marine Protected Area**

Climate change and biodiversity collapse are the two greatest threats we face today. Solutions put forward to address one of these crises must not contribute to making the other worse. In the Climate Action Plan 2050+, offshore windfarm is a solution to mitigate the climate crisis, which may add pressure to the already crowded sea. Therefore, as a foundation for ecological civilisation development, planning must factor in this future change in our sea, this will allow for improved preparedness and response, as well as reduced vulnerability of marine systems. The government can **establish a Marine Spatial Planning Authority** to lead a comprehensive and ecosystem-based spatial planning process. The new Authority should initiate a strong governance arrangement, with broad representation such as related departments and bureaus, industries and businesses, community users, academics, the environmental sector, and Shenzhen authorities.

5. **Northern Metropolis**

In the 2021 policy address, the Chief Executive pledged to create and maintain a landscape of wetlands in the Deep Bay by bringing 2,000 ha of wetlands and fishponds under a system of Wetland Conservation Parks. The proposed Parks system will be actively managed, and even restored, to enhance their ecological value. The government can allocate funding and resources to **establish a cross-bureau office** to kick-start consultation and stakeholder engagement, allowing local stakeholders, such as pond fish farming operators, green groups, and the broader community, to have an input. The office can recognise and protect sites of conservation importance through effective policies and regulations, alleviate development pressure on sites of conservation importance, ensure smooth transition from policy announcement to designation of protected areas, and ensure the protected areas are planned, established, and managed for conservation.

Apart from the above issues, there is a lack of standards and requirements for “Green” Bonds. To avoid green washing, the government must develop a **science-based gold standard for green bond issuance** that factor in both biodiversity and climate impact. WWF has the expertise to advice as we are a member of the technical expert group in the European Union taxonomy process, and we are also involved in the Indonesian Green Taxonomy recently launched a few weeks ago. We also believe Hong Kong should **transition to a circular economy**, to realise a vision of [no plastic in nature](#) by 2030. WWF stands ready to work closer with the Panel on a holistic conservation policy that benefits both nature and the people of Hong Kong in the coming Legislative Council term.

Yours faithfully,

Nicole Wong
CEO, WWF-Hong Kong

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