WWF’s Recommendations for the 2018 Policy Address – Transform Hong Kong into Asia’s Most Sustainable City
SUMMARY

1. 10% Marine Protected Areas designated by 2020, and commercial fishing excluded
10% of Hong Kong sea area designated as Marine Protected Area by 2020, and 30% by 2030. Commercial fishing should be banned in the three existing Marine Parks in eastern waters (Tung Ping Chau, Hoi Ha Wan, Yan Chau Tong). Recover the Greater Bay area Chinese White Dolphin population.

2. Tackle marine litter
Significantly reduce Hong Kong’s marine litter by ensuring the removal of underwater ghost nets, setting up waste collection and recycling facilities near coastal areas, and plastic deposits on all plastic bottles to ensure they are recycled.

3. Phase out the domestic sales of ivory and treat wildlife crime as a serious crime
Secure a rapid phase out of the local Ivory trade, increase fines and penalties for wildlife traffickers to maximum 10 year indictable offences, and list wildlife offences under Schedule 1 of the Organized and Serious Crimes Ordinance.

4. More renewable energy in Hong Kong
A 10% renewable electricity target is needed for 2030 and a commitment to ensuring feed-in tariffs are set at a level to provide small-scale investors a payback period of 8-10 years. The government can set an ambitious yearly target for installing renewables on their own buildings.

5. Incentives to ensure that all new vehicles are electric vehicles
The government should provide sufficient incentive to ensure that every new car purchase is an electric vehicle, and that there is sufficient charging infrastructure to support them.

6. Enhancing energy efficiency measures for appliances and buildings
Stronger energy efficiency labels are needed for electrical appliances, and must also be used on commercial appliances. The BEAM building efficiency standard must be strengthened.

7. Brownfield development must be prioritized to help safeguard our green spaces
The government to take initiative to analyze land use in Hong Kong, focusing on brownfield and vacant land and formulate development plans to meet society housing and other needs without threatening sites of ecological and conservation importance.

8. Establishing 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.

9. A sustainable Lantau Island
Bring important unprotected sites into the protected area system (including West Lantau waters, Shui Hau Wan and Tai Ho valley), and provide enforceable land use control over South Lantau.
WWF Hong Kong recommends the following policies for consideration and adoption by Chief Executive Mrs Carrie Lam in her inaugural Policy Address, to help transform Hong Kong into Asia’s most sustainable city:

1. 10% Marine Protected Areas designated by 2020, and commercial fishing excluded

Hong Kong is full of many precious marine habitats and vibrant marine life. However, its beauty is gradually encroached by rampant coastal development and unsustainable fishing. Over 7,000 hectares of Hong Kong waters had been reclaimed, yet only 2% has been designated as marine parks or reserves – an area that is definitely inadequate to protect our deteriorating marine environment.

   a) A Marine Protected Area (MPA) network plan should be developed covering **10% of Hong Kong waters identified as the permanent sanctuary for marine life by 2020.** WWF also urges the government targets to protect and conserve at least 30% of waters in Hong Kong effectively by 2030.

   b) To offer a nursery and resting space for vulnerable habitats and species, **commercial fishing should be banned in the three existing marine parks in the eastern waters** (i.e. Tung Ping Chau, Hoi Ha Wan, Yan Chau Tong). The government should allocate more resources in promoting proper surveillance and enforcement of MPAs, so as to combat illegal fishing activities and ensure the fisheries resources could be recovered without unexpected disturbance. A well-managed MPA will bring wider benefits to fisheries recovery and support the livelihoods of people relying on the marine resources, eventually help achieving long-term ecological, social and economic objectives.

   c) The designation of Fisheries Protection Areas (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 potentially an important tool to facilitate recovery of the local fisheries by protecting important fishery and nursery areas, many doubts remain. **Specific objectives for FPAs need to be formulated, and the types of controls on fishing that will be employed within a FPA must be prescribed.**

   d) Produce and implement a cross-border **Greater Bay area Pearl River Delta management plan to arrest the decline and then recover the population of Chinese White Dolphins**, in cooperation with the relevant Guangdong authorities.

2. Tackle marine litter

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1 https://apps.wwf.org.hk/hotspot-map/
The problem of marine litter has been a persistent environmental issue in Hong Kong for decades, and grows worse every year\(^2\). Litter appears along the shoreline, floats on the waters surface and also sinks to the seabed. This affects our marine ecology in many dimensions, and needs to be comprehensively tackled. Strategies include:

a) Underwater ghost nets are a long-lasting threat to marine ecosystems and to fisheries. The government needs to assess the distribution and quantity of ghost nets, and **formulate a solid strategic plan to remove this abandoned fishing gear.** Approaches include training experienced divers to remove them from ecologically sensitive areas, implementation of licensing and tagging of nets, and strengthening of reporting mechanism to regulate the disposal and recovery of nets.

b) The marine recreational sector is a potential source of marine litter, so government **should provide more waste collection and recycling facilities near piers**, and work with the marine sectors to minimize marine litter generation.

c) A policy to incentivize the recycling of plastic bottles is needed to ensure they do not end up in Hong Kong’s waters. The government has committed to commission a feasibility study on producer responsibility scheme of plastic containers in the 2017 Policy Address 2017. **The government should introduce a programme to place deposits on all plastic bottles** to ensure that they are recycled, as well as increase the capacity of recycling industry to treat plastic wastes locally in order to close the loop of plastic pollution. Deposit schemes for PET bottles in other countries have resulted in over 95% recycling rates.

3. **Phase out the domestic sales of ivory and 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, and Hong Kong, which is a major transit hub as well as one of the world’s largest ivory retail markets.

a) **The government must contribute to the global effort to halt the decline in elephant populations by phasing out the domestic trade of ivory as soon as possible, backed by stronger enforcement and heavier penalties.**

b) To further deter transnational criminal gangs who use Hong Kong as a favoured route for wildlife smuggling. Hong Kong’s wildlife crime offences **should be included under Schedule 1 of the Organized and Serious Crimes Ordinance (OSCO).** The Hong Kong Police Force and the Customs and Excise Department must step up their joint

\(^2\) [http://d3q9070b7kewus.cloudfront.net/downloads/coastalwatchreport_chi_compressed.pdf](http://d3q9070b7kewus.cloudfront.net/downloads/coastalwatchreport_chi_compressed.pdf)
efforts to become much more involved in the process of preventing trans-national wildlife crime.

4. More renewable energy in Hong Kong

The Hong Kong Government plans to reduce its absolute carbon emission by 26%-36% using 2005 as the base. But the current planned replacement of coal power stations with gas is not sufficient to meet this objective. Nor does this strategy achieve the long term goal to fully decarbonise electricity generation by 2050. The government needs to shift focus to the deployment and scaling up of renewable energy sources, through three policies:

a) Set a renewable energy target to supply 10% of Hong Kong’s electricity from renewables by 2030, sending a clear signal to investors that the administration is serious in its intention to fully deploy renewables.

b) Implement a favourable feed-in tariff (FiT) policy. The new scheme of control agreements signed in April 2017 include provisions to introduce the FiT to reward customers for investing in installing renewable energy sources. The policy should be implemented so the FiT provides investors a strong incentive. Small residential consumers should be offered an introductory rate of around $4/kWh, with a fixed term of 20-25 years, to ensure a pay-back period of 8-10 years. The rate should be reduced for later adopters once installation costs fall. The rules and procedures set up by the power companies and the government need to be simplified for small generators.

c) Public bodies responsibility for public housing, reservoirs and transport infrastructure can take a greater lead in solar PV deployment by setting an ambitious overall yearly target for deploying new renewable energy.

5. Incentives to ensure that all new vehicles are electric vehicles

Electric vehicles (EVs) emit less greenhouse gases than similarly sized petrol and diesel engine cars and have zero kerb-side emissions of local air pollutants, enhancing air quality. WWF supports the government’s position of making public transport by rail the first priority. The Chief Executive also needs to develop a strategy on EVs to hasten the replacement of petrol and diesel engine vehicles with EVs. This can be achieved through:

a) A pledge to cease importing petrol and diesel engine cars by 2030.

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3 Singapore aims to supply 8% of its needs from renewables by 2030 despite poorer wind resources than Hong Kong. [Link](https://www.nccs.gov.sg/climate-change-and-singapore/national-circumstances/singapores-approach-alternative-energy)
b) Offer financial incentives to purchase EVs, broadly related to the size of the vehicle’s battery, to reflect their current higher production costs compared to petrol and diesel engine cars.

c) Adopt new policies to hasten the development of charging infrastructure. This includes ensuring that there is a presumption that charging facilities will be provided in homes and offices at the request of an EV owner and building owner committees, and building management companies should not interfere or impede such requests.

6. Enhancing energy efficiency measures for appliances and buildings

Strengthening of policy on building and electrical appliance energy efficiency are two opportunities for government to ensure we use less energy and cut greenhouse gas emissions. Commercial electrical appliances are not covered under government’s mandatory energy labels scheme aimed at improving energy efficiency of electrical appliances, and labels on all appliances generally provide little differentiation for people purchasing them despite their difference in energy performance.

On the other hands, buildings account for over 60% of greenhouse gas emissions in Hong Kong and in the 2017 Policy Address, the government signalled its intention to review the current arrangements for granting Gross Floor Area (GFA) concessions for new buildings that register for Building Environmental Assessment Method Plus (BEAM plus). This provides a number of energy efficiency opportunities:

a) Extend the regulation of electrical appliances under the Mandatory Energy Efficiency Labelling Scheme (MEELS) from domestic to commercial appliances. The scheme should also have a broader spectrum of coverage and put priority on high energy consumption commercial appliances such as refrigeration, air-conditioners and heaters.

b) The government should introduce a special category “Grade 1 Star” which is only awarded to the top five percent of appliances within a category as identified during the EMSD’s standardised tests. This list will be reviewed annually to ensure only top performers are awarded the “Grade 1 Star” label.

c) A review of the GFA concession is needed to ensure this valuable financial incentive is only provided to buildings whose design exceeds minimum building standards by a significant margin, and which will give rise to a long-term reduction in building’s
energy use. The scale of the GFA awarded should be linked to the level of BEAM plus attainment e.g. 2% for bronze, 6% for silver, 8% for gold and 10% for platinum.

d) **Specific targets** are set for building design specific components of the BEAM plus assessment that **give rise to long term and permanent energy efficiency**. This includes attainment of indicators EU1, EU2 & EU13⁴.

e) The government should develop an incentive programme to encourage building owners to make investments in existing buildings to enhance energy performance⁵. This includes **providing a transferable GFA concession** for investment that the building owner can either use on a future project or sell into the market for another developer to use.

7. **Brownfield development must be prioritized to help safeguard our green spaces**

Holistic town planning and smart land policy can help to maintain balance between conservation and social needs including green space and urban development. We urge the government to clearly adopt “brownfield first” as the key urban planning and development principle, instead of rezoning green belts with significant ecological value or attempting to develop country parks⁶.

a) The Town Planning Board should properly exercise its role to **prevent unsuitable brownfield applications**. All applications for new brownfields should be rejected and enforcement on all unauthorized brownfield sites should be strengthened to prevent their 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 system**.

8. **Establishing a conservation trust**

⁶ [http://d3q9070b7kewus.cloudfront.net/downloads/finalized_leaflet_72dpi_20161201.pdf](http://d3q9070b7kewus.cloudfront.net/downloads/finalized_leaflet_72dpi_20161201.pdf)
Though private lands with high ecological value should in principle be zoned for conservation purposes, in practice it is often difficult to realize real conservation benefits. Conflict between conservation needs and property rights of landowners is intensifying, yet existing conservation mechanisms are inadequate in resolving this conflict. In the Inner Deep Bay wetlands, many of the fish ponds are owned by private developers and development is allowed under the current Public-Private Partnership (PPP) scheme, but is not happening.

A well thought-through arrangement is needed to ensure these wetlands are protected and managed to optimize their conservation value. A new policy entity—a Conservation Trust—is required to safeguard and finance the long-term biodiversity management of important sites. WWF believes the Conservation Trust should:

- **a) Be a statutory trust independent from government**, such as the National Trust in UK. The legal and institutional basis for the trust should be supported by an ordinance.

- **b) Have a clear goal and a credible governance structure.** It can buy, receive, hold and manage sites of high conservation value. It can also formulate comprehensive plans for the entire Deep Bay wetlands, rather than having individual plan for private wetland reserves set up under PPPs.

- **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 public-private partnership projects, donations, land sales, and government funds.

**9. A sustainable Lantau Island**

The Sustainable Lantau Blueprint has adopted the planning vision of “balancing development and conservation”. Development plans in the north of the island are clear and in progress, and additional conservation measures are being considered in the south to ensure the valuable habitats, wildlife and landscape on Lantau are conserved and bring benefits to the local communities and visitors.

WWF urges the government to undertake the following key conservation measures in south Lantau:

- **a) Bring important unprotected sites into the protected area system.** These include West Lantau waters (core habitat for the Chinese white dolphin), Shui Hau Wan (a rich
WWF’s recommendation for the 2018 Policy Address

tidal sand flat) and Tai Ho valley (a Country Park enclave with an ecologically important stream, feng shui woods and a freshwater marsh)

b) Establish Pui O Water Buffalo Nature Park to safeguard the unique water buffalo maintained marsh and the diverse wild plants and animals associated with it.

c) Provide enforceable land use control over South Lantau to prevent unauthorized development such as land filling and maintain the character and landscape.

ENDS