

WWF-Hong Kong
Recommendations for 2021-2022 Policy Address



Executive Summary

Biodiversity, and the benefits it provides, is fundamental to a healthy planet and to the well-being of Hong Kong's people. It is our planet's life-supporting 'safety net'¹. Despite ongoing efforts, biodiversity is deteriorating locally and globally, and this decline is projected to continue or worsen under business-as-usual scenarios. If not urgently stopped and reversed - through improved conservation measures, and by addressing both direct and indirect drivers, including unsustainable production and consumption - biodiversity loss will have major negative impacts, including on Hong Kong society and its economy. Loss of ecosystems and ecosystem functions would leave communities, infrastructure, and economic development vulnerable, especially as the impacts of climate change become more severely manifested. Hong Kong's footprint, and its influence on biodiversity loss, extends well beyond our borders, given our consumption, trade, and other business dealings; thus, Hong Kong also has a global obligation to contribute to planetary health.

As we approach the Fifteenth meeting of the Conference of the Parties (COP15) to the Convention on Biological Diversity (CBD), hosted by China, it is critical that the Chief Executive set out a comprehensive, ambitious, and exemplary plan to implement a holistic nature conservation policy with the goal of transforming society's relationship with biodiversity and to ensure that by 2030 we reverse our influence and contribution to the loss of biodiversity. We must commit to achieving a nature-positive Hong Kong and, by 2050, to fulfilling the shared vision of living in harmony with nature, where biodiversity is valued, conserved, restored, and wisely used, thereby maintaining ecosystem services, sustaining a healthy planet, and delivering benefits essential for all Hong Kong people, especially to survive the climate crisis that is now upon us. Such a policy would be complementary to, and supportive of, the 2030 Agenda for Sustainable Development. The implementation of such a policy requires integrative governance and whole-of-government approaches to ensure policy coherence and effectiveness, political will, and recognition at the highest levels of government.

¹ International Union for Conservation of Nature, *IUCN Position on UPDATED ZERO DRAFT of the Post-2020 Global Biodiversity Framework*, 20 Apr. 2021, Available at: www.iucn.org/sites/dev/files/iucn_position_on_the_updated_zero_draft_of_the_post-2020_global_biodiversity_framework_-_april_2021.pdf (Accessed: 6 August 2021)

WWF-Hong Kong therefore recommends the following policies for consideration and adoption by the Chief Executive:

- 1. Ensure that all land and sea areas are under inclusive and integrated spatial planning, and formalise implementation of Strategic Environmental Assessments**
- 2. Address both the biodiversity and climate crises in an integrated approach through Nature-based Solutions**
- 3. Ensure that the direct and indirect harvesting, trade and use of wild species is sustainable, legal, and safe for human health**
- 4. Ensure that at least 30% of coastal waters are included within marine protected areas**
- 5. Eliminate single-use plastic and textile pollution by transitioning to a circular economy**

Details of Policy Recommendations

1. Ensure that all land and sea areas are under inclusive and integrated spatial planning, and formalise implementation of Strategic Environmental Assessments

A holistic nature conservation policy cannot be credible and successful unless it clearly identifies the sectors driving biodiversity loss and proposes concrete actions to address those sectors. Infrastructure and urban, coastal, and marine development have large impacts on biodiversity. Under our proposed ‘Holistic Nature Conservation Policy’, the government must formulate and adopt holistic, long-term landscape-scale conservation plans in areas where environmental conservation is paramount. In particular, such an approach is urgently required for the watersheds of South Lantau in order to safeguard vital ecological connectivity—from the protected ridges to the coastlines and waters of South Lantau. To achieve this, there is an urgent need to address the loophole in the Town Planning Ordinance (Cap. 131), to regulate incompatible land uses in South Lantau, especially if we are to avoid negative impacts on a proposed marine park at Shui Hau sandflat and Tong Fuk (proposed by the late Prof. Brian Morton and colleagues²). This Park would protect critical intertidal and subtidal habitats for endangered horseshoe crabs and clams. In addition to the ecological important, the clams are socio-economically important for South Lantau³.

In addition to spatial planning, it is critical to improve governance to ensure infrastructure, urban, marine, and coastal development minimize impact on areas of particular importance for biodiversity and ecosystem services, ensuring people- and nature-positive outcomes. Infrastructure and development must not undermine Hong Kong’s obligations under the Convention on Biological Diversity and the objectives of Hong Kong’s own Biodiversity Strategy and Action Plan for the sustainable use of biodiversity. This does not mean there can be no development; instead, it means that development and biodiversity conservation would be integrated in mutual

² Morton, B., Leung, S.F., and Leung, K.F. (2021). The biology and functional morphology of *Meretrix cf. meretrix* (Bivalvia: Veneridae: Meretricinae) at Tong Fuk Miu Wan, Shui Hau, Lantau Island, Hong Kong. *Regional Studies in Marine Science*, 45, 101842. <https://doi.org/10.1016/j.rsma.2021.101842> (Accessed: 6 August 2021)

³ So, K.J.Y., Cheang, C.C., Hui, T. Y., and Chan, J.K.Y. (2021). Understanding the behavioural gap between perceived and actual environmental behaviour: Investigating the clam-harvesting pattern in Hong Kong SAR, China. *Journal of Cleaner Production*, 316. <https://doi.org/10.1016/j.jclepro.2021.128259> (Accessed: 6 August 2021)

ways to sustain both in a world now dealing with a climate crisis that is now the most critical existential threat to humanity and other biodiversity.

Hong Kong may be geographically small, but we have a significant global role to play. We can also be a role model to the Greater Bay Area and the world. Our variety of landscapes and ecosystems has blessed us with relatively high biodiversity. An official biodiversity indicator report is needed to provide robust information for reporting biodiversity changes and to guide ongoing actions to conserve biodiversity.

The government's Preliminary Feasibility Study on Developing the New Territories North (NTN)⁴ has suggested that *“Due consideration would be given to preserving established settlements and good agricultural land where possible. This new form of urban development will result in medium- to high-density developments intermingled with the rural environment comprising active agricultural land and agricultural land of high potential for rehabilitation and rural settlements”*. However, the current New Territories North development proposal is posing development threats to biodiversity, active agricultural land, and agricultural land of high potential for rehabilitation in NTN New Town and Man Kam To. WWF believes such agricultural land is of environmental and social-economic importance to Hong Kong society.

WWF Hong Kong recommends the following measures be adopted by the government:

- a. Formulate and adopt holistic, long-term landscape (and marinescape) conservation plans to protect ecologically important habitats, with South Lantau watersheds as a priority.
- b. Include all land under statutory land use planning requirements with Development Permission Area Plans, and regulate land uses under Outline Zoning Plans.
- c. Formalize the procedures for conducting Strategic Environmental Assessments⁵ to incorporate principles of the Convention on Biological Diversity, including no net loss,

⁴ Planning Department and Civil Engineering and Development Department. (2017). Preliminary Feasibility Study on Developing the New Territories North. Retrieved from [https://www.pland.gov.hk/pland_en/p_study/comp_s/ntn_study/ntn_es\(eng\).pdf](https://www.pland.gov.hk/pland_en/p_study/comp_s/ntn_study/ntn_es(eng).pdf) (Accessed: 6 August 2021)

⁵ Cornish, A. (2013). *The Potential for Strategic Environmental Assessment to Assist in Mainstreaming Biodiversity into Decision Making in Hong Kong*, Civic Exchange. Retrieved from

precautionary principles, wide stakeholder participation, and incorporating traditional and scientific knowledge.

- d. Establish a Marine Spatial Planning authority and allocate adequate funding to kick-start the first stage of marine spatial planning.
- e. Ensure an inclusive, transparent, and participatory approach is adopted during spatial planning process.
- f. Publish a biodiversity indicator report for Hong Kong on a regular basis, with associated obligations in response to any indications of biodiversity loss.
- g. Safeguard the integrity of Deep Bay ecosystems, particularly the Mai Po Inner Deep Bay Ramsar site, including against the impacts of climate change. WWF-Hong Kong manages the nature reserve embedded in the Ramsar site, but many wetlands in the surrounding Wetland Conservation Area and Wetland Buffer Area are less well managed and are vulnerable to change and degradation from anthropogenic mismanagement, misuse, and from climate change. An adaptation plan is urgently needed.
- h. Accelerate the consultancy study on Agricultural Priority Areas commissioned by AFCDC and provide a clear timeline of its corresponding stakeholder engagement exercise.

2. Address both the biodiversity and climate crises in an integrated approach through Nature-based Solutions

Climate change and biodiversity collapse are the two most significant threats facing both people and nature today, in Hong Kong and globally. These crises are intertwined and must be addressed jointly. Nature-based Solutions can be very effective to address these crises, and we should grab any opportunities before options are lost. Therefore, both biodiversity values and climate impacts must be integrated into policies, regulations, planning, development processes, accounts, and assessments of environmental impacts, at all levels of government and across all sectors of the economy, ensuring that all activities, and financial flows (public and private), are aligned with biodiversity values and climate impacts.

https://www.afcd.gov.hk/english/conservation/con_bsap/bsap_bio_clearing_house/files/common/20131212SEA.pdf
(Accessed: 6 August 2021)

The recently launched IPCC Sixth Assessment Report states “*Global warming of 1.5°C and 2°C will be exceeded during the 21st century unless deep reductions in carbon dioxide (CO₂) and other greenhouse gas emissions occur in the coming decades. With further global warming, every region is projected to increasingly experience concurrent and multiple changes in climatic impact-drivers. Changes in several climatic impact-drivers would be more widespread at 2°C compared to 1.5°C global warming*”⁶. Globally, we are already seeing catastrophic events, such as severe heatwaves, wildfires, serious flooding and storms, droughts, as the consequences of climate change unfold. Hong Kong is not immune; we are seriously vulnerable to typhoons and storm-surges as sea-levels rise, and these events will have devastating socio-economic consequences. To ensure Hong Kong as a livable city in 2030, there is an urgency for the city to build climate resilience and adopt the mid-century 1.5°C net zero pathway approach, which aligns with the IPCC’s goals for the upcoming COP26 to be held in late 2021.

To reach this goal, the government can establish policy frameworks, backed by commitments, mandates, and laws that support the integration of climate change adaptation objectives and strategies into development planning across the whole territory, and especially in the ocean and coastal areas. These measures would clearly complement and support policies and initiatives at the national level. WWF Hong Kong continues to stress the importance for the government to secure the wetlands in the Mai Po Inner Deep Bay Ramsar Site’s Wetland Conservation Area and Wetland Buffer Area, and to retain their ecological functions and services, including those wetlands under private ownership, to sustain the integrity of the Ramsar site and the East Asian-Australasian Flyway (EAAF) as a part of the climate adaptation strategy. The mangroves and other wetlands in Mai Po and elsewhere in Hong Kong will also be important as coastal buffers against the impacts of climate change, especially the strong storm and tidal surges that we can expect in the future. Conserving these wetlands as a climate adaptation strategy is a community priority; converting them will benefit few.

⁶ Intergovernmental Panel on Climate Change. (2021). Summary for Policymakers. In: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on ClimateChange. Cambridge University Press. In Press. Retrieved from https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf (Accessed: 11 August 2021)

WWF Hong Kong proposes the following **Nature-based Solutions** be adopted by the government as a matter of climate urgency:

- a. Raise the bar of the existing climate change and decarbonisation plan, with target-setting grounded in science-based approaches that align with the mid-century 1.5°C net zero pathway.
- b. Fully integrate and mandate biodiversity values and climate impact in policies, regulations, planning, development processes, accounts, and assessments of environmental impacts at all levels and portfolios of government and across all sectors of the economy.
- c. Establish a Climate Action Authority to ensure the mainstreaming of climate action.
- d. Meet a minimum 10% renewable energy (RE) target by 2030, with integration of biodiversity protection during all stages of planning, construction, and operation.
- e. Diversify Hong Kong's RE portfolio through regional collaboration, with application of certified sustainably sourced biofuel to abate "international emissions" from the aviation sector.
- f. Apply a 'no further conversion of wetlands' policy, with regulations, to all of Hong Kong's coastal wetlands.
- g. Establish a regulated Land Trust to provide feasible alternatives for landowners, such as land swaps, to resolve the current land rights deadlock on wetland use and management, while securing land for biodiversity conservation and Nature-based Solutions to climate change through negotiation and long-term financing.
- h. Require financial institutions to measure, assess, disclose, and account for risks, dependencies and impacts associated with biodiversity loss and climate impacts by 2023⁷.

3. Ensure that the direct and indirect harvesting, trade and use of wild species is sustainable, legal, and safe for human health

To reverse biodiversity loss, a transformation of the drivers of biodiversity loss is necessary. Therefore, unsustainable production and consumption must be addressed while meeting Hong

⁷ Taskforce on Nature-related Financial Disclosures. (2021). Letter from new TNFD Co-Chairs announcing the launch of the TNFD. Retrieved from <https://tnfd.info/news/letter-from-the-tnfd-co-chairs/> (Accessed: 17 August 2021)

Kong people's needs through sustainable use and benefit-sharing. A milestone to halve the footprint of production and consumption by 2030 and targets covering all drivers, including food systems, diets and infrastructure, is needed. The government must ensure that the direct and indirect harvesting, trade and use of wild species is sustainable, legal, and safe for human health, including by applying the ecosystem approach to fisheries, and urgently address both demand and supply of illegal wildlife products.

WWF urges the government to:

- a. End the sale of high disease-risk and endangered wildlife in both physical and online markets, including the exotic pet markets, by 2023.
- b. Strengthen the traceability, regulation, monitoring and enforcement of Hong Kong's exotic pet trade markets, with priority on parrots and tortoises.
- c. Perform ivory stockpile spot checks after the start of the ivory ban (31st Dec 2021).
- d. Establish a Seafood Labelling System to provide transparent information on source country, catch method and scientific names on pre-packaged seafood products.
- e. Establish a Sustainable Aquaculture Policy to mandate biofiltration/ filter system in all aquaculture farms.
- f. Strengthen regulatory protection for marine animals, such as whale shark (*Rhincodon typus*) and the two species of horseshoe crab (*Tachypleus tridentatus* and *Carcinoscorpius rotundicauda*) found in Hong Kong⁸.
- g. Urgently strengthen measures to address illegal fishing, including stronger collaboration between government agencies, cross-boundary collaboration with Guangdong authorities, and strengthening penalties and awareness of enforcement agencies and judiciary.

4. Ensure that at least 30% of coastal waters are included within marine protected areas

Currently, only 5% of Hong Kong's waters are designated or planned to be established as Marine Protected Areas (MPAs) by 2023, with most of them being compensation for developments; this

⁸ Whitford, A.S., Cornish, A., Griffiths, R., Woodhouse, F.M. (2013). A Review of Hong Kong's Wild Animal and Plant Protection Laws. Faculty of Law, The University of Hong Kong. Retrieved from <http://www.cpao.hku.hk/media/130917lawreview.pdf> (Accessed: 11 August 2021)

is not enough to fulfill Hong Kong's obligations as part of commitments to the CBD. WWF argues that MPAs can provide huge social-economic benefits during the post-COVID green recovery period, for instance, from eco-tourism, scuba-diving, and fisheries. We urge the government to take a proactive and precautionary approach and commit to a specific and timebound roadmap for increasing coverage of effectively managed MPAs to cover 30% of Hong Kong waters by 2030. The MPA network should be based on a science-based planning exercise that incorporates strict no-take reserves, Fisheries Protection Areas (FPAs), species-specific conservation zones, community-based fisheries reserves, and other MPA designations. The establishment of FPAs has been postponed indefinitely and the progress is not transparent. The government should review the establishment schedule and provide progress update regularly.

Under the proposed Holistic Nature Conservation Policy, an all-round management plan must be implemented in all MPAs and proposed FPAs to conserve and restore the ecosystem, including: establishing strict no-take zones; formalising a fisheries resources monitoring system and catch reporting system; strengthening habitat connectivity; strengthening illegal fishing control and penalties; regulating non-selective and unsustainable fishing methods (e.g. trammel nets and snake cages); monitoring and improving management effectiveness; and regular removal of ghost fishing gear.

To prevent the extinction of the Pearl River Delta population of Chinese white dolphins (*Sousa chinensis*) (CWD), the Hong Kong government must work closely with the Guangdong authorities to activate timely conservation actions. Governments can refer to the *Emergency Action Plan for Chinese White Dolphins*⁹, formulated jointly by authorities, academics, conservationists and specialists from Hong Kong and the broader Greater Bay Area, for developing a regional management plan to preserve key habitats and mitigate major human impacts. Key actions include

⁹ Woo, K.Y. (Editor), Chan, C.Y.S., Chan, K.K., Chan, T.T., Char, Y.T., Gui, D., Ho, Y.W.D., Huang, X., Karczmarski, L., Lam, Y.H., Leung, K.M.Y., Li, S., Lin, W., Liu, W., Luo, Y., McCook, L. J., Ng, W. C., Olson, D., Porter, L., Wong, W. H., Wang, D., Wang, K., Wang, Z., Wu, H., Wu, Y., Yeung, C.W., Yu, W., Zhang, W., Zheng, R., Zhu, Q. (Contributors). (2020). *Emergency Action Plan for the Pearl River Delta Population of the Chinese White Dolphin (Sousa chinensis) 2020*. WWF-China, WWF-Hong Kong, Shenzhen & Hong Kong SAR. 45 pp. Available at: https://d3q9070b7kewus.cloudfront.net/downloads/cwd_emergency_action_plan_for_the_prd_population_2020.pdf (Accessed: 11 August 2021)

establishment of buffer areas connecting key dolphin habitats and diversion of major shipping lanes.

WWF advocates the following actions from the government:

- a. Establish and commit to, by 2022, a roadmap for MPAs to cover 30% of Hong Kong waters by 2030, with effective site-specific management plans.
- b. Establish a development-free Dolphin Conservation Management Area off western and southern Lantau by 2024, of increased coverage and effectiveness than the current MPA.
- c. Update the Environmental Impact Assessment Ordinance (EIAO) to effectively mitigate underwater noise impacts by mandating acoustic propagation modelling studies.
- d. Establish, by 2025, a Shui Hau Marine Protected Area, with zoning that provides strict protection to the most ecologically sensitive area and allows regulated activities in the outer zone.
- e. Establish a Ninepins MPA by 2026 to drive socio-economic benefits, enhance climate resilience and facilitate fisheries resources recovery.
- f. Accelerate the designation of the FPAs, with the aim of recovering depleted fish stocks.
- g. Update the Marine Parks and Marine Reserves Regulation (Cap.476A) to implement species-specific measures within designated marine parks.
- h. Expedite cross-boundary management of protected areas throughout the Greater Bay Area.

5. Eliminate single-use plastic and textile pollution by transitioning to a circular economy

Plastic pollution is a global crisis. WWF is urging cities worldwide to fight for a world with no plastic in nature by 2030. It's a world where our oceans teem with marine life, not discarded nets, bottles and bags. Currently, plastic is flowing into our natural environment at an unprecedented rate – every minute, one garbage truck of plastic is dumped into our oceans. The government must stop the flow of plastics from entering nature through elimination of unnecessary plastic; doubling reuse, recycling and recovery; and ensuring the remaining plastic is sourced responsibly. Effective waste management systems and bold and legally binding instruments are therefore needed to combat marine plastic pollution.

In 2019, Hong Kong sent 123,735 tonnes of textile waste to landfills. Hong Kong people's high consumption level has tremendous social and environmental impacts locally and globally. A Fashion and Textile Policy is urgently needed to tackle the waste and pollution from the sector. Under the proposed Holistic Nature Conservation Policy Framework, the government must support transition of business to climate and nature-positive models and stimulate the large-scale adoption of circular economy business models. Conscious and informed choices should be encouraged, and consumers should have access to relevant sustainability information and alternatives. Currently, we lack the policies and measures to stimulate the demand and supply for sustainable products and services.

Therefore, WWF suggests the following actions from the government:

- a. Accelerate the single-use plastic cutlery and tableware ban legislation process by banning all polystyrene tableware by 2023, and phase out other single-use plastic and biodegradable tableware for both dine-in and takeaway services by 2025, including individual packaging for tableware items.
- b. Establish an aid fund for the F&B industry to roll out incentive schemes for customers to bring their own tableware.
- c. Provide clear and comprehensive guidelines for the industry to implement regulations towards sustainable practices.
- d. Set a high levy on single-use shopping bags of any material, with minimal exemptions, by 2022.
- e. Expand the Plastic Recycling Pilot Scheme to all districts.
- f. Speed up the introduction and implementation of municipal solid waste (MSW) charging scheme in Hong Kong.
- g. Develop an Extended Producer Responsibility (EPR) system for textile and apparel industries.
- h. Regulate clothing labels with mandatory information on care and specific fiber composition.