

Policy Address Submission 2015

by

The Conservancy Association



長春社 since 1968

The Conservancy Association

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長春社對施政報告 2015 的建議 (摘要)

政策範疇	建議
- 自然保育	<ul style="list-style-type: none"> - 制定全港保育策略及行動綱領，作為大嶼山及新界地區發展的前題。立即依據檢討 2004 年新自然保育政策，全面落實《生物多樣性公約》 - 協助成立一個全港性的環境保育基金 - 加快制定發展審批地區圖，特別是郊野公園「不包括的土地」
- 環境影響評估	<ul style="list-style-type: none"> - 檢討環境影響評估條例及其執行
- 廢物處理	<ul style="list-style-type: none"> - 必須以按量計算的原則在按戶收費的基礎上全面推行廢物徵費，並在 2016 年或以前全面落實所有都市廢物按量徵費，定期檢討收費水平 - 制定清晰時間表，在 2018 年或之前將生產者責任制逐步擴展至塑膠容器、包裝物料、飲品容器、橡膠輪胎、木材、所有電池等 - 把飲品玻璃樽生產者責任計劃擴展至所有包裝飲品 - 馬上啟動建築廢物收費計劃的檢討工作，並提升收費水平 - 在 2018 年或之前訂立長遠及全面的回收行業支援配套計劃，包括回收基金 - 在 2022 年或之前落實禁止把資源(包括所有可回收物料及廚餘)運往堆填區 - 每年檢討落實資源藍圖的成效並公佈結果，按結果分階段擴建堆填區
- 農業	<ul style="list-style-type: none"> - 檢討香港農業政策 - 把農業加入《生物多樣性公約》行動綱領的討論之內 - 確立農業發展為土地規劃過程中的指導原則之一
- 氣候變化及能源	<ul style="list-style-type: none"> - 提高使用可再生能源，取代化石燃料 - 能源組合長遠達至無核目標 - 邀請公眾討論各核安全措施 - 在 2020 年，本地溫室氣體排放從 1990 年水平降低 25% - 透過聯網及排污交易等機制，鼓勵可再生能源發展 - 為更換有能源標籤產品的住戶提供補貼 - 探討透過修改公司相關法例，公開註冊公司減少碳排放的成效 - 提供誘因及指引，讓政府及公營機構投資發展對氣候及環境有善的業務
- 樹木保育	<ul style="list-style-type: none"> - 更積極落實樹木管理策略，達致符合可持續發展及良好規劃的綠化工作 - 訂立樹木法

- 古蹟保育	<ul style="list-style-type: none"> - 設立文物古蹟保育基金 - 檢討文物保育政策，特別是私人擁有的歷史建築物 - 重視文化遺產及景觀保護的政策及評估
- 空氣污染	<ul style="list-style-type: none"> - 設立空氣質素管制區，制定行動計劃，令空氣質素達到健康指標 - 由政府提供補貼，把現時 18,000 部的士更換為電動車輛。電動車輛計劃亦應逐步擴展至公共小巴 - 推廣重組巴士路線

CA Submission on Policy Address 2014 (Summary)

Policy Area	Suggestions
- Nature Conservation	<ul style="list-style-type: none"> - Formulate and implement a comprehensive conservation plan and action guideline as a pre-requisite for Lantau Island and NT developments. According to the review of 2004 New Nature Conservation Policy, press ahead the implementation of CBD in Hong Kong - Facilitate the formation of a territorial wide “Nature Conservation Trust” - Expedite the process of publishing Development Permission Area Plans
- Environmental Impact Assessment (EIA)	<ul style="list-style-type: none"> - Review EIA Ordinance and its operation
- Waste Management	<ul style="list-style-type: none"> - Implement Municipal Solid Waste (MSW) charging scheme before or by 2016 on “per household by weight” basis, and regularly review charge rates - Set a clear timetable to gradually expand the Producer Responsibility Scheme (PRS) to include packaging material, Tetra Pak cartons, rubber tires, lumber and all types of batteries before or by 2018 - Start reviewing the construction waste disposal charging scheme - Create comprehensive and long-term support programs for recycling industry, including recycling industry before or by 2018. Develop the industry chain for local environmental sector - Implement a landfill ban which restricts all recyclables and food waste from being sent to landfills before or by 2022 - Expand landfill by phases upon reviewing and monitoring progress on the implementation of the Action Blueprint and effectiveness of waste reduction annually
- Agriculture	<ul style="list-style-type: none"> - Review Hong Kong agricultural policy - Relate agriculture in the discussion of CBD action plan in Hong Kong - Recognize agricultural development as one of the guiding principles in land planning process
- Climate Change and Energy	<ul style="list-style-type: none"> - Strengthen the use of renewable energy to replace fossil fuel - Implement “no-nuclear” in the long-term fuel mix - Engage the public on various nuclear safety measures - Set a target of 25% GHG reduction below 1990 level by 2020 - Encourage renewable energy development through inter-connection of electricity grid (i.e. smart grid) coupled with implementation of emission trading mechanism - Offer rebate for residents to replace old electrical appliance with those products have energy labels - Explore the feasibility of revising company laws to request the publication of listed companies’ effort in carbon reduction - Develop incentives and guidelines for government and public organizations to invest public fund with climate- and environmentally- friendly businesses only
- Tree Conservation	<ul style="list-style-type: none"> - Adopt proactive tree management strategy for sustainable and

	<ul style="list-style-type: none"> well planned greening - Enact tree ordinance
- Heritage Conservation	<ul style="list-style-type: none"> - Establish a Heritage Conservation Trust - Initiate review on heritage conservation policy, especially on conserving private-owned heritage - Recognize cultural and landscape heritage protection in related policy and assessment
- Air Pollution	<ul style="list-style-type: none"> - Designate Air Quality Control Zones and formulate action plans to ensure the air quality can achieve the healthy standard - Subsidize the 18000 taxis to switch to electric vehicles and gradually extend the vehicle switching scheme to light buses - Promote the work of bus route rationalization

Introduction

The recent cases where China has 4 cities piloting carbon trade and Guangdong has implemented a carbon cap may, again, have demonstrated the lack of progress of sustainable development and “Green Growth” in Hong Kong. While the international community including China has been mainstreaming green growth in a wide range of policy to ensure sustainable economic well-being through more sustainable use of natural resources, efficiency in the use of energy and recognition of the intrinsic value of ecosystem services, Hong Kong has stepped backward by endorsing projects that practice “destroy first and compensate later” mentality.

One of the starting points for the discussion requires understanding on our existing environmental baseline condition which is often misinterpreted or even ignored during the early planning stage of various infrastructure work in Hong Kong. This is why The Conservancy Association (CA) keeps on urging for a detailed Strategic Environmental Impact Assessment (SEA) for all regions, especially the Lantau marine water. A holistic environmental and conservation scheme with measurable targets for conservation of habitat and species, instead of mitigating the environmental impact after construction phase in accordance with the statutory system of EIA only, is urgently needed.

CA is in great disappointment that the SAR Government does not intend to cherish co-planning on any environmental works with reference to the arrangement on various planning study and environmental projects. We therefore wish to reiterate the importance of genuine engagement and communication channels between the SAR Government and green groups, as well as other civil parties.

Nature Conservation

1. Discussion on implementation of the Convention on Biological Diversity (CBD) in Hong Kong would serve another good opportunity for the government to review on New Nature Conservation Policy which was released in November 2004. As we had pointed out during the preparation of this 2004 policy, the scope of the policy should cover all aspects of nature conservation rather than just looking at private lands. We reiterate that Hong Kong needs a comprehensive nature conservation policy which is aimed at rectifying CBD and achieving no net loss in biodiversity. The review should at least include:
 - An action plan for the implementation of CBD; The identification of all sites of high conservation value that are outside the current protected areas of Hong Kong in addition to the existing 12 priority sites;
 - Expedite the process of publishing Development Permission Area Plans (DPA) to cover sites of high ecological importance, particularly on the remaining Country Park Enclaves, as a temporary measure to secure those sites from unsuitable development. The recent destruction in Yi O and Pak Sha O are another alarming signal for suspected case of “destroy first, develop later” so that planning control through DPA is necessary. We urge the Government to quickly review all of the Country Park Enclaves and designate them as Country Park as a long term solution to the protection of the integrity of Hong Kong’s Country Parks.
 - Facilitate the work of the conservation trust set up to protect the biodiversity and natural treasures of Hong Kong.
 - Develop Hong Kong Red List and comprehensive programme on public education and engagement for the development of Biological Strategy and Action Plan.

2. In specific, the project below worth particular attention
 - Developing Lantau: Same as the main theme of policy address last year, HKSAR aims at developing land in large scale for fulfilling housing demand, including developing Lantau Island into an “East Lantau Metropolis”. However, lots of large-scale projects, such as Tung Chung New Town Extension, Third Runway and Hong Kong-Zhuhai-Macau Bridge (HKZHM), and so on, are going to be completed in Lantau Island. The plan of “East Lantau Metropolis” should not be implemented when the cumulative impact from the above projects on marine ecosystem are uncertain. Special attention should be paid on reclamation in Sunny Bay since the EIA report of HKZHM revealed that Sunny Bay where two special species of seagrass had once been discovered according to the EIA report of HKZHM. CA as always, would like to reiterate that conservation should be on the top priority in development of Lantau Island.
 - Tung Chung Remaining Development: While any reclamation and channelization work in Tung Chung River Valley should be prohibited, it should be covered by DPA plan to

- prevent further cases of eco-vandalism.
- North-east New Territories New Development Area (NENT NDA): The proposed 37-hectare Long Valley Nature Park for long-term conservation is appreciated, but it should be further extended to the northern part of Long Valley as more than 140 bird species have been recorded in the agricultural land there. The northern part of Long Valley plays a vital role as a wildlife corridor linking up Long Valley and Deep Bay wetland system via the Shenzhen River.
 - Land Use Review in Kam Tin South and Pat Heung: The scale of this planning study, which is similar to NENT NDA and Hung Shui Kiu, has not carried out conventional 3 stages public consultation before statutory planning process of Town Planning Board. Besides, the ecological assessment in the study is not updated and detailed. Worst still, mitigation habitats are encroached by various land uses and would weaken the ecological implication of mitigations. All the above should be improved to prevent from setting undesirable precedent in any planning projects in future.

Environmental Impact Assessment (EIA)

3. The EIA Ordinance and the legal system have been in operation for more with over 200 EIA studies completed. From the KCRC Sheung Shui to Lok Ma Chau Spurline EIA in 2000, the judicial review on Lung Mei, the recent controversy on NENT NDA EIA and 3rd Runway EIA, it is obvious that the current version of the EIA Ordinance and the related assessment scope and procedures no longer meet citizens' aspiration to conserve the natural environment from damages caused by various forms of land development. In April 2014, China has revised its Environmental Protection Law in which the legal status of Environmental Impact Assessment was enhanced where EIA consultants and project proponents will be punished for fraudulent and untrue contents presented in the EIA report leading to environmental pollution and ecological destruction. CA would reiterate that the government should immediately review the EIA Ordinance and its operation to improve the EIA system in Hong Kong.

Waste Management

4. CA reckons that the latest waste policy does contain some positive initiatives, but the document on the whole does not present a holistic blueprint and detailed action plan for sustainable resource management. We would highlight the 6 suggestions which have been announced by us and various green groups since 21st March 2014.
 - **To fully implement municipal solid waste (MSW) charging scheme before or by 2016** – and regularly review charge rates – to meet the Action Blueprint 40% waste reduction target by 2022. Pilot MSW charging programme should be carried out as soon as possible to prepare for full-scale implementation. Charging mechanism should be on

“per household” basis

- **To set a clear timetable** to gradually expand the Producer Responsibility Scheme (PRS) to include packaging material, Tetra Pak cartons, rubber tires, lumber, and all types of batteries before or by 2018. PRS control on glass beverage bottles should be also extended to all types of packaging beverage
- **To immediately start reviewing the construction waste disposal charging scheme** by raising the charge rates and improving the trip-ticket system, through the use of an online real-time barcode process, to instantaneously confirm construction waste has reached the landfill or public fill to reduce illegal landfill dumping. This should be accompanied by increasing the penalty to serve as a deterrent
- **To develop the industry chain for local environmental sector**, announce the details for the Recycling Fund before applying for funding for the landfills and incinerator, and create long-term, comprehensive support programs for the recycling industry before or by 2018
- **To implement a landfill ban** – to restrict food waste, glass, paper, plastic and other recyclables from being sent to landfills before or by 2022
- **To expand landfill by phases** – progress on the implementation of the Action Blueprint and effectiveness of waste reduction is reviewed and monitored annually and publicized. If the results are insignificant, it cannot continue its expansion

Agriculture

5. The controversial North-east New Territories New Development Area (NENT NDA) planning study has reflected the failure of the government to secure land for agriculture. Agriculture has long been regarded as sunset economy in Hong Kong but its contribution goes far beyond monetary value and include ecological enhancement, preservation of rural landscape, social interaction, recreation, food safety and food security and so on.
6. The CE in its manifesto promised to “review the integrated social values of the agricultural industry in Hong Kong from the perspective of ecological landscape and ‘Green Hong Kong’ and set up an inter-departmental working group to formulate policies to promote and support new-age multi-functional agricultural activities on land suitable for agriculture”. Such mission would not be achieved if a comprehensive review on agricultural policy is not in place. It is a foreseeable failure if such a policy follows the general policy framework of free market with minimal government intervention. A sustainable agricultural policy in Hong Kong should recognize its connection with land use planning, experiential education, workforce diversity and development, soil protection, self-sufficiency ratio, food safety and public health promotion, community-based business model development, lifestyle choices, etc.

7. Indeed biodiversity and agriculture and inter-related as agriculture would not only provide food source and raw materials for human, but also performs ecosystem services like soil and water conservation. Although nature conservation and agriculture are within the authority of Agriculture, Fisheries and Conservation Department (AFCD), the concept of agricultural biodiversity happens to be unknown in departmental and even bureau level. CA urges that discussion on agriculture should take place under the context of the CBD action plan to promote sustainable agriculture in Hong Kong.
8. While various Planning and Engineering Feasibility Studies in New Territories, such as Hung Shui Kiu, Yuen Long South, Kam Tin South, North New Territories, and so on, would be launched in the following years, CA urges that the issue of agriculture should be highlighted as one of the guiding principles in the entire planning process so that all tenants can choose to either continue farming activities in-situ or accept farm rehabilitation offer elsewhere.

Climate Change

9. CA has always been upholding an anti-nuclear stand. The tragic Fukushima Incident is a tragic lesson to learn for Hong Kong to re-consider nuclear energy as a way to combat climate change. The proposal to increase proportion of nuclear power to 50% in the energy mix in 2020, claiming to reduce greenhouse gas, is never a sustainable measure due to the disastrous consequences of nuclear plant incidents and disposal of radioactive waste. CA urges Government to put stronger emphasis on exploring renewable energy to replace fossil fuel and reducing energy consumption. In the long-term, Hong Kong should achieve the goal of “no nuclear environment”.
10. Both Fukushima Incident and the defective fuel rod at Daya Bay Plant have revealed that the entire public is not informed the risk assessment and performance of nearby nuclear plants, nor the contingency plans in case of radioactive leakage. CA suggests that the public should be well-informed various nuclear safety measures.
11. CA is disappointed to see no concrete commitment and initiative made after the C40 Large Cities Climate Leadership Group workshop. While the workshop was a good information and experience sharing platform for greenhouse-gas reduction policies and measures, all proposed actions would become meaningless if the Administration does not put them into real practice. CA strongly urges the Government to shoulder our own responsibility, in particular, to set a target of 25% GHG reduction below 1990 level by 2020.
12. Indeed, the Framework Agreement on Hong Kong/Guangdong Co-operation had already stated to explore inter-connection of electricity grid, clean energy and renewable energy development

strategy. CA would like to see Government to take this opportunity to introduce renewable energy. Inter-connection of electricity grid coupled with implementation of emission trading mechanism would further encourage renewable energy development. Under the scheme, plants hoping to increase emission should pay for CO₂ generation through buying quota from less-polluted companies who adopt renewable energy.

13. Offering electricity rebate to general public has long become a common practice for the Administration in recent years, claiming to relieve public hardship. CA from the environmental perspective objected further electricity rebate to public as it gives no incentives on energy-saving. Instead the Administration should further facilitate climate change adaptation measures, such as rebate for residents to replace old electrical appliance with those products have energy labels.
14. The Administration has little follow-up actions after the territorial-wide consultation in December 2010 where 50-60% carbon intensity reduction target was set. Strong emphasis should be focus on demand-side management and clear actions and target should be set for demand-side management.
15. Climate change adaptation strategies should be carefully considered, planning and implemented. Like other international cities, the government should actively explore the feasibility of revising the related company laws to request listed companies to publish their carbon reduction efforts. There should be incentives and guidelines for government and the public organisations to invest public money with business that are climate and environmentally-friendly.

Tree Conservation

16. After setting up the Greening, Landscape and Tree Management Section for more than 4 years, the major development on tree management is still limited on tree risk management. However, the worry we mentioned since the “Policy Address Submission 2010” that “over-management” on trees has been happened. Such problem has been extended to private owned trees after the recent Robinson Road fatal tree accident.
17. To reduce risk of trees, large scale tree pruning works have been carried out everywhere. However, most of the pruning works were incorrect, such as topping and lion-tailing. Bad pruning works are likely producing more hazard trees in the future.
18. The tree management in Hong Kong is still in fire-fighting style. We strongly urge to adopt proactive tree management strategy for sustainable and well planned greening.

19. Tree Ordinance is necessary in the long run for providing legal framework to facilitate good management and establish penalties. The Robinson road tree accident clearly showed that the Government has not enough power to prevent poor tree management within private lots. However, Tree Ordinance cannot function properly without the establishment of a comprehensive tree management system.

Heritage Conservation

20. This is the fourteenth year CA proposed the idea of a Heritage or Conservation Trust in our policy submission. As institutional changes take years to accomplish, we do not expect the task could be completed next year. But the groundwork should be laid as soon as possible. Engaging various heritage conservation bodies should be in transparent way and, more importantly, at the very early stage.
21. In the past few years, we noted that Development Bureau was willing to put more resources on revitalization for individual projects, but issues such as mechanism on conserving private-owned heritage, grading system remains stagnant. The cases in Ho Tung Gardens and demolished Eastern Cotton Mill have sent out a potentially damaging message that the government fails to stop development in the expense of conservation of our built heritage. A comprehensive policy review on heritage conservation is urgently needed.
22. A comprehensive policy review on heritage conservation has long been conducted by the Home Affairs Bureau since 2004. The consultation paper pointed out the direction of conservation of a street and even an area, but the government did not commit financially. The granting of West Wing as graded building is a chance to put forward the idea of Heritage Conservation Zone since the Government Hill is owned by the Government and does not involve compensation. The concept of cultural and landscape heritage should also be included in the overall policy and assessment framework.

Air Pollution

23. Air pollution continues to be top of a public health concern issue. Air pollutants came from Pearl River Delta regional as well as local sources. To control the regional sources, it is imperative to continue set the regional emission reduction targets under the Guangdong – Hong Kong Collaborative Framework Agreement on Environmental Protection. To this end, expert groups and stakeholder groups (including NGOs) should be formed to mobilize all resources in the community to help formulate and implement the reduction targets.

24. The “Umbrella Movement” has unexpectedly resulted in great improvement in roadside air quality in the main traffic arteries in Central, Causeway Bay and Mong Kok. This further proves the effectiveness of Air Quality Control Zones (AQCZ), which CA has long been proposed in the previous Policy Address submission, in alleviating roadside emission. The air quality within the AQCZ, including the roadside, should comply with the AQO. Action plan should be formulated to ensure the air quality can achieve the healthy standard. The “Umbrella Movement” revealed that pedestrianization of streets is an effective means to improve road side air quality. Air pollution in roadside would be in increasing trend again if the work of bus route rationalization still remains slow in progress. While it has been stated clearly in the public consultation document of Air Quality Objectives Review that “considerable health benefits could be generated from this proposed measure”, the Administration should put this on top priority in combating roadside emission.

25. Taxis and other commercial vehicles are the main sources of air pollutants in urban areas. Although taxis have been switched to LPG vehicles since 2000, it continues to be very polluting as Government roadside remote sensing data show that the exhaust emissions of LPG taxis far exceed the regulated emission levels. It is possible that the taxis run for 24 hours a day and thus the maintenance is poor. The catalytic converters may no longer work at full efficiency. To improve this situation, one logical solution is to switch the 18,000 LPG taxis to cleaner vehicles including hybrid and/or electric battery powered vehicles. Adequate incentive should be given to realize this change. This is in line with the stated Government policy to promote electric vehicles. The electric vehicle initiative should gradually be extended to light buses.

26. PM2.5 has been proven to have significant impact on human health. Government should formulate and implement effective measures to control and suppress PM2.5 based on the Clean Air Action Plan 2013. There should be real-time data on PM2.5 emission easily accessed by the public.