

Clerk to Panel on Environmental Affairs
Legislative Council Secretariat
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Central, Hong Kong



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Submission from The Canadian Chamber of Commerce in Hong Kong to the Legco Panel on Environment Affairs on the impacts of the development of nuclear energy for local power generation on Hong Kong

In the wake of the shocking nuclear tragedy at Fukushima Dai-ichi in Japan, The Canadian Chamber of Commerce in Hong Kong welcomes the opportunity to present its opinion to LEGCO on the impacts of the development of nuclear energy on Hong Kong.

As stated in our previous submission in December 2010, The Canadian Chamber of Commerce in Hong Kong is in general supportive of nuclear power as it is a highly reliable, relatively low cost and competitively available source of energy. Nuclear electricity also emits no GHG's in power generation and hence is an essential climate change mitigation measure to reduce Hong Kong's GHG emissions and carbon intensity.

We consider the development of more nuclear power generation capacity across the border both an opportunity and a risk to Hong Kong business. In particular, we are concerned that 28 nuclear reactors (including current, under construction & planned) will be in Guangdong province and 10 of these will be 50-60km from Hong Kong. This makes Hong Kong a significant stakeholder in the associated safety and health risks and we would like more transparent information such as who is building them, when and how they are being built.

We believe that a balanced view of the risk of nuclear power generation is vital for Hong Kong businesses and that if the risks and opportunities were more transparent then Hong Kong businesses could better safeguard against the risk and evaluate the opportunities.

We believe also that Hong Kong businesses could benefit from enhanced contingency planning between Hong Kong and the PRD, particularly in the area of evacuation, water, shelter and health. We would like to suggest that a Pearl River Delta (PRD) Nuclear semi-autonomous body be set up that allows Hong Kong businesses to be represented in this body.

Finally as per our last submission, we suggest further consideration needs to be given to Hong Kong's climate change strategy, governance and coordination structure including how it engages with business and how it responds to local power generation issues between HK and the PRD.

The Canadian Chamber of Commerce in Hong Kong is encouraged that the Hong Kong Government plans to schedule a nuclear safety exercise for early 2012 for its government departments, however we think there would be significant value in integrating Hong Kong business and members of the public to take part in this exercise. We are encouraged that the Chinese government has suspended approval of all new nuclear projects on March 16 2011, pending safety checks of existing plants. We are also encouraged that CLP has confirmed it would "step up necessary measures" to enhance operational safety, including anti-flooding measures in Daya Bay.

Finally, we wish to extend our deepest condolences, prayers and sympathies to the people of Japan.

Concerns

1. More information needed - Backyard Concerns

"China has the world's biggest nuclear program, 13 in operation, 26 reactors under construction and 28 planned", World Nuclear Association

We are concerned that 28 nuclear reactors (including current, under construction & planned) will be in Guangdong province and 10 of these will be 50-60km from Hong Kong. This makes Hong Kong a significant stakeholder in the associated safety and health risks and we would like to request more transparent information (such as who is building them, when and how they are being built) on the planned nuclear power reactors in Guangdong.

2. Safety and Operational Transparency

While we are aware that Daya Bay is in the top quartile of global safety in its operational performance, we request more transparent information on the safety and best practice standards for the other current and planned power plants in Guangdong.

3. Radioactive Carrying Capacity of Wind: We are concerned about the lack of scenarios available on the prevailing winds carrying capacity of radioactive fallout from nuclear power plants in Guangdong. We would like to request that analysis of wind radiation from Guangdong is conducted to determine the potential impact on Hong Kong, particularly looking at the first two weeks following a nuclear incident which is deemed the greatest threat to people's health and to the environment.

Suggestions

1. Further Health and Water Contingency Planning Needed: While we acknowledge the Hong Kong Government's contingency plan in respect to nuclear accidents at Guangdong Nuclear Power Station (GNPS) and Liagao Nuclear Power Station at Daya Bay (LNPS) (50 -60 km from Hong Kong urban areas) – we request that further contingency planning is done for Hong Kong's health system, water systems and includes health preparedness measures (such as stocks of iodine tablets and bottled water) etc.

2. Co-ordinated HK & PRD Evacuation & Shelter Plan: We also think that the contingency plan should include a co-ordinated HK & PRD evacuation and shelter plan, while considering the likely stress on Hong Kong and the PRD's transport systems.

3. Nuclear PRD Advisory Body: While we are aware of China's National Nuclear Emergency Command Platform, set up by China's Commission of Science Technology and Industry for National Defense, we suggest a nuclear PRD semi-autonomous body be established that includes Hong Kong business input and representation. This PRD nuclear body would exchange transparent information, study stakeholders concerns, follow regulatory oversight and communicate on a regular and updated basis with foreign institutions, business and public websites.

4. Set up a HK Climate Change Authority: While we welcome the establishment of the Inter-departmental Working Group on Climate Change, we suggest that a Hong Kong 'Climate Change Authority' be established to better coordinate and respond to Hong Kong's climate strategy including local power generation issues between HK and the PRD and work with commissions, agencies, corporations, chambers and NGOs.

5. Public Education: Schools and members of the public alike in Hong Kong would benefit from a reliable portal that includes a balanced overview on nuclear power. More information is needed on the safer "fourth generation" of nuclear power plants, as well as the next generation of radiation detection and measurement methods. This would hopefully lead to more rational behaviour avoiding unfounded panic behaviour such as the recent panic buying of salt.

6. Increased Transparency on Risks and Opportunities: More transparent information about the risks and opportunities of nuclear power generation in China would allow companies in Hong Kong to price the risk and evaluate the opportunities.