

**Hong Kong's Climate Change Strategy and Action Agenda**

**Comments submitted by**

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*(opinions expressed are personal views of the author and do not represent those of the Hong Kong Polytechnic University)*

1. Generally, the proposed strategies outlined in the consultation document are supported. In particular, the adoption of reduction targets on carbon intensity and total and per capita green house gas emission is welcomed.
2. In calculating the total green house gas emission, Hong Kong should take into account the embodied energies in the goods and materials that are produced in other places but are consumed/used in Hong Kong as we import most of these materials from the mainland or abroad. For example, producing a tonne of cement would generate about 1 tonne of CO<sub>2</sub>. Hong Kong uses huge quantities of imported cement and other products produced elsewhere but these emissions would not be accounted for in the present calculation. Without a proper accounting method, relevant policies and measures would not be formulated to reduce GHG emissions associated with these goods and related activities.
3. Unavoidably, in order to meet the proposed reduction in GHG emission target, the shifting of electricity generation from fossil fuels to nuclear is necessary. Nuclear safety and management of nuclear waste will be the major concern. Also, it is understood that most, if not all, nuclear electricity sources will be located in the Mainland. Hong Kong should be careful not to deprive the right of the Mainland users from using such "clean" energy sources so that they will be forced to revert back to the "dirty" fossil fuel technologies.
4. The policy of progressively using incineration to replace landfills in Hong Kong is also supported. In the past, incineration of waste has received much negative publicity in relation to its possible dioxin and other air pollutants emissions. In Hong Kong, three old incinerators were decommissioned in the 1990s. But with the advances made in combustion and air emission control technologies, thermal waste treatment can now be regarded as a proven technology that can effectively reduce the volume of waste requiring final disposal. Incinerating a unit quantity of waste also generates significant less green house gas than landfilling the same amount of waste.