

19 November, 2010

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Clerk to Panel on Environmental Affairs  
Legislative Council Secretariat  
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Dear Madam/ Sir,

Re: Carbon Care Asia (CCA) submission to  
Legco Panel for Environmental Affairs Meeting on 26 Nov 2010, concerning  
*Hong Kong's Climate Change Strategy and Action Agenda Consultation Document,*  
*September 2010*

On behalf of Carbon Care Asia (CCA), I would like to submit some comments and recommendations concerning HK climate change strategy and action agenda as laid out in the captioned *CCSAAC Document*, for the Legco Panel's consideration.

Carbon Care Asia (CCA) is a carbon specialist company set up in Hong Kong to provide sustainable market solutions in carbon reduction. It is our mission to facilitate favorable conditions for the sound development of low carbon economy in this region. CCA shares the vision that Hong Kong, in the league of the C40, can play a significant carbon leadership role to help mitigate the climate change crisis. Hong Kong's place should be among the leaders and not laggards in the new low carbon economy.

Upon these premises, CCA has the following opinions:

1. CCA agrees that there is a genuine and urgent need to formulate a climate change strategy and action agenda for Hong Kong, which will **bring HK up to speed** with the actions of the world's most advanced economies and cities.
2. We think that Hong Kong, being an advanced economy, should target reductions in GHG emissions in absolute terms, i.e. in percentage of carbon equivalent reduction by 2020 and 2030 compared to the base year's emissions (now set to 2005), and not by carbon intensity as proposed in the current *Document*. Carbon intensity is appropriate only for developing economies, which HK is not. In this light, the proposed target of 19% to **33% absolute reduction** in GHG emissions in 2020 compared to 2005 figures would be more acceptable.
3. Better still Hong Kong should set its carbon accounting **base year to 1990** (instead of 2005), a standard practice that most advanced economies such as the EU and Japan have adopted according to the Kyoto Protocol.

4. As a foundation of a low carbon economy, Hong Kong needs to establish systematic, credible and representative **carbon accounting and reduction benchmarking systems** for entities to report and monitor carbon performances and statistics, and also for the purpose of cross referencing with other cities and economies.
5. We agree that, in order to achieve the reduction targets of 2020, it is more practical to adopt the strategy of **reducing the use of coal** and increasing the use of natural gas and non-fossil fuels to meet the electricity demand for Hong Kong in the next ten years. However the case for switching to nuclear power in such a large scale needs to be rigorously and responsibly examined concerning its environmental and financial impacts.
6. We support in principle the Government's proposed reduction targets, in particular the goals to scale up energy efficiency, green transportation, renewable energy and waste reduction. However, we regret to see a **significant gap in that carbon offsetting has not been included in the current action agenda**. As demonstrated by nearly all other affluent and advanced economies, carbon offsetting is a most efficient way to reduce global GHG emissions and contribute to sustainable development and low carbon technologies in developing and poor regions.
7. Hong Kong, as among the world's most affluent cities, **should include carbon credits in its reduction pathways; and play a leading financing role** in the fast growing carbon trading markets in China and the wider regions.
8. We strongly agree that Hong Kong should strengthen regional co-operation in the PRDR and aspire to be one of the greenest cities in China. The Government should purchase **carbon credits from projects in the PRDR** to offset a certain percentage (*5% or more*) of Hong Kong' unavoidable GHG emission.
9. We suggest that the Government should lead by example and kick-starting the low carbon economy with a **low carbon / carbon neutrality action plans** for all government buildings, facilities, departments, institutions, projects and events.
10. We suggest that the Government should lead and support the development of low carbon and **carbon neutral zones / districts** in the city. This will act as excellent driver to community-based low carbon developments and reduction actions.

I hope that our comments will be considered by the honorable members of the Legco Panel, and concerned Government officials.

Yours sincerely,

Trini Leung  
Executive Director  
Carbon Care Asia