



## **Civic Party's Response to the Consultation Document on Hong Kong's Climate Change Strategy and Action Agenda**

In response to the Hong Kong Government's consultation document on Climate Change Strategy and Action Agenda, the Civic Party would like to highlight the following key issues:

### **1. GHG Emission Reduction Targets**

In line with the commitment by developed countries and regions, we believe that Hong Kong should commit to a target on the basis of absolute GHG emissions, rather than on the basis of carbon intensity. Hence, corresponding to the government's proposal to reduce carbon intensity by 50-60% by 2020 based on 2005 level, we propose that the government should adopt a target to reduce total GHG emissions by not less than 30% by 2020 based on 2005 level, which is equivalent to about 20% reduction of absolute GHG emissions based on 1990 level – a target en par with most developed countries and regions.

### **2. Regional Perspective**

We regret that the government's primary means of achieving its emission reduction target is to increase the import of nuclear power. Whilst the safety and cost issues of nuclear power are still up for debate (in this regard the government has a duty to offer detailed data to facilitate informed discussions), the methodology of calculating such reduction is problematic.

Unless there is a clear, transparent and traceable set of regional carbon footprint account for the entire Pearl River Delta region, there is no certainty that the increased use of nuclear power by Hong Kong will indeed result in the reduction of GHG emissions. For instance, if there is a set limit to the potential of nuclear power in Guangdong, increased import of nuclear power by Hong Kong may result in more power generation facilities using fossil fuel, which will in turn lead to additional GHG emissions. If that is the case, the presumed benefit of GHG reduction by increased use of nuclear power in Hong Kong will be negated.

We believe that the government must produce a full set of regional GHG reduction plan including the entire carbon footprint account of the Pearl River Delta, correct the methodological error, and prove its case on a regional basis if it were to continue to pursue the nuclear power option as a means for GHG reduction.



### 3. Green Transport

We welcome the government's initiative in promoting wider use of electric vehicles. In this regard we believe it is essential for the government to step up complementary measures, such as the adoption of low-emission zones, restriction of high-emission vehicles through stricter licensing or electronic road pricing, the promotion of mobility-on-demand schemes, etc.

### 4. Green Buildings

We welcome the government's initiative in promoting green buildings. However the energy efficiency targets are way below comparable cities in Europe. The lack of initiative to promote energy efficiency measures for existing building stocks is particularly disappointing. We believe that regulation-driven incentives are important in this regard.

### 5. Carbon Offset Strategy

We noted that there is a total absence of carbon offset strategy in the consultation document. We believe that a carbon offset programme based on internationally accepted standards, such as CDM carbon credits approved by UNFCCC as well as stand-alone incentives to encourage Hong Kong companies to invest in renewable energy projects in the Mainland, should become an integral part of Hong Kong's climate change response.

### 6. Information Disclosure

We noticed that the full consultancy report on climate change strategy is still outstanding. This has deprived the public of important information to assess the pros and cons of most of the initiatives proposed. In view of this the effectiveness of the current consultation exercise is much diminished. We urge the government to release full information in its study, including the regional data mentioned in point 2 above as a matter of urgency, and extend the public consultation period accordingly.

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