

Hong Kong Chinese Civil Servants' Association
Environmental Protection Officer Branch

香港政府華員會 環境保護主任分會

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By fax (fax no. 2845 2444) and post

The Honourable Ms CHOY So-yuk, JP,
Chairperson, LegCo Panel on Environmental Affairs

Dear Ms CHOY,

**Reorgansization Plan for the Food Safety Regulatory Framework
and
Integration of Nature Conservation with Environment Protection
Functions**

I write, on behalf of the Environmental Protection Officer Branch (EPOB) of Hong Kong Chinese Civil Servant Association, to voice out our grave concern on the recent proposal by the Administration to merge the nature conservation and management of country and marine park of Agriculture, Fisheries and Conservation Department with Environmental Protection Department (EPD).

The proposal came as a total surprise to all staff of the Environmental Protection Department on last Friday. It was the first time that the staff was informed of the proposal just 4 days before the joint LegCo Panels Meeting of Food Safety & Environmental Hygiene and Environmental Affairs. With such a short notice, there was insufficient time for the staff side to grasp the gist of the paper, nor to have any meaningful discussions among the staff on the impact of the merger on the functions of environmental protection. We express total dissatisfaction on the way the Administration rush through such an important proposal which will have far reaching impact on the effectiveness of the Department in delivering the important functions of environmental protection for many

years to come. It is important that the staff should be given the opportunity to express their views and comment on the proposal.

We, as the only staff union representing the environmental professionals of the department, do not see that merging the nature conservation and management function of country and marine park with the environmental protection function of this department is neither the best option nor a norm for advanced countries. Instead, management of national parks is usually an independent responsibility of the department of agriculture or forestry in many other countries. On the other hand, we are worried that such a merger would undermine the core functions of this department in protecting our still deteriorating environment.

While this department is still adjusting to the recent major merger with our environment bureau on 1 April this year, the new Environmental Protection Department formed since 1 April are faced with lots of environmental protection challenges ahead. Among these challenges, there are Construction Waste Charging Scheme, Municipal Solid Waste Charging Scheme, Product Responsibility Scheme, Landfill Extension Programme, Waste Reduction and Recycling Programme, Eco-park Project, Clinical Waste control legislation, Integrated Waste Treatment Facilities, Regional Air Quality Monitoring, Cross-Border environmental issues, Public Light Bus LPG Programme, Control Programme on Volatile Organic Compounds, reduction of air emissions from power plants We wonder how this department or our Director cum Permanent Secretary (Environment) still has the extra capacity to manage the execution of another equally important function of the nature conservation and management of country and marine parks without undermining the core functions of environmental protection. We have the worry that the proposal would cause decisions on environmental policies and programme either to lose their momentum or be delivered in a hasty manner.

If the nature conservation and the management of country and marine parks are to be integrated into the Environmental Protection Department, the size of the department will almost be doubled overnight. The administrative, IT and human resources support of the department will be overly stretched to cater for such a rapid expansion resulting in

inadequate attention and resources planned for the professional development of the department.

I am sure all the environmental professionals in the department would like to see that the proposal be thoroughly consulted, discussed, and its pros and cons fully considered before the best decision for the betterment of our environment is made. We do not want to see that the proposed merger would divert our attention and focus to clean up the air we breath and the harbour we are proud of; to plan for a sustainable waste disposal plan and, all in all, to strive to protect our environment.

Yours faithfully,



(Alan H.L. YIM)
Chairman
Environmental Protection Officer Branch
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c.c.

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