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## **WWF Submission to Legco on Mandatory Building Energy Codes**

WWF strongly endorses the Government proposal to enact mandatory building codes for Hong Kong. Introducing ambitious mandatory codes, for new and existing buildings, will significantly reduce Hong Kong greenhouse gas emissions, reduce air pollution from Hong Kong power stations and lower energy bills to Hong Kong's people.

Whilst WWF will provide a more in-depth technical response to the Government's proposal as part of the consultation, it is clear that the success of the proposed measure will depend upon the retention of a number of important details within the current proposed framework.

In particular:

**Level of ambition at which the codes are set:** Annex B (page 31) of the Government consultation paper compares HK's existing voluntary building energy codes with mandatory codes in other countries. It is imperative that HK's new mandatory building codes are set at levels that ensure that Hong Kong's standards are on par with the best in other countries. In some cases, for example lighting, the existing BECs do not look adequate in this regard and will need to be upgraded before inclusion in a mandatory system.

**Applicability to existing buildings:** Nearly 90% of electricity, the major source of HK CO<sub>2</sub> emissions, is used in existing buildings. Whilst new buildings are also important, we can not wait decades for Hong Kong's building stock to be replaced before cutting greenhouse gases. Whilst building codes must be applied in a different manner between new and existing buildings, to exclude existing buildings would effectively neutralize the environmental benefits of the Government proposal. They must be retained.

**Regular upgrading:** Mandatory building codes must be regularly upgraded to reflect the rapid pace of technology change in the energy efficiency sector, which is currently evolving rapidly as a result of a huge expansion in investment and political priority. **Monitored and enforced:** The proposed Codes must be accompanied with a monitoring and enforcement system that ensures it is implemented by all concerned. This must include the provision of penalties sufficient to deter deliberate non-compliance.



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**Mandatory energy audits:** The government's proposal to introduce mandatory energy auditing will provide important information for potential tenants to make decisions on the basis of energy performance, thus permitting competition the basis of energy performance.

WWF will produce a more detailed analysis of how these requirements can be met as part of the consultation process. We encourage Legco members to keep an informed watch on the proposed Codes to ensure that the minimum criteria necessary for delivering an effective system that achieves significant energy and greenhouse gas savings are met.

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