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**Submission to the Environment Bureau of the
Hong Kong SAR Government on the Consultation
Document of Hong Kong's Climate Change
Strategy and Action Agenda**

**Oxfam Hong Kong
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Introduction

This is a submission from Oxfam Hong Kong (OHK) concerning Hong Kong's Climate Change Strategy and Action Agenda (Consultation Document) issued in September 2010.

Oxfam Hong Kong (OHK) supports the formulation of a holistic climate change policy in Hong Kong as soon as possible, given how climate change has been threatening the livelihoods of poor communities and vulnerable groups. This is also in line with international acknowledgement of the urgency of combating climate change.

OHK sees climate change not only as an environmental issue, but also as one that poses social impacts and challenges to vulnerable groups. Therefore, the solution must include both mitigation and adaptation actions.

Mitigation actions are undertaken to address the long-term risks of climate change by reducing greenhouse gas emissions, while adaptation actions are needed to respond to short-to-long-term risks that are unavoidable.

However, OHK is disappointed that the Consultation Document fails to position adaptation as an integral and essential component of the climate change policy. Nor does it provide a clear assessment of impacts to and protective measures required by vulnerable groups in Hong Kong.

Oxfam proposes that the Hong Kong SAR Government (Government) should have a better understanding of both climate change challenges and how the international community has been taking measures to combat climate change.

This submission includes experiences from international cities such as London, New York, Toronto and Singapore. OHK hopes it sheds some light on what a good adaptation strategy may look like, but stresses that it is Government's responsibility to formulate adaptation strategy to save lives.

Oxfam also requests the government to release the full version of the consultation report for public inspection and discussion. No details of the consultation document have been released, leaving the public uninformed as to what assumptions it is based on and what assessments were actually conducted.

OHK's comments on the Consultation Document

1. Addressing climate change should not only be about cutting emissions, but also about saving lives and securing livelihoods

International efforts to combat climate change reflect the urgent need to provide people with a safe and secure place to live and work. Climate impacts are not linear or incremental. Historical climate precedents are no longer valid for long-term planning. We can expect an increase in extreme events. Therefore, taking measures to adapt to climate change now will limit the damage to human lives and assets and associated costs in the future.

In both international and national efforts to combat climate change, adaptation has become an integral and essential part of overall policy. Both London and New York, for example, give adaptation a high priority and both cities have their own adaptation strategies. The rationale is that they are taking a risk-based approach, as climate change exposes the cities and their residents to new hazards and heightened risks.

However, in the whole Consultation Document, out of 64 pages, only six pages cover adaptation policy. The vision statement does not confirm that the Government envisages the need to build a safe and secure city in a changing climate.

This reflects the Government's weak understanding of the climate challenge ahead. It still predominantly treats climate change as an environmental issue, thus seeking an energy solution. Ad hoc responses to extreme climate events are not enough to ensure long-term adaptation.

As reflected in a survey conducted by OHK in September 2010, an overwhelming 96 per cent of respondents agreed that climate change has already affected Hong Kong, and a majority could also clearly identify both environmental and social impacts.

Hong Kong needs to develop not only as a low carbon city, but also as a safe and secure place to live.

2. The urgent need to protect vulnerable groups

Vulnerable groups contribute very little to greenhouse gas emissions, but suffer most from climate impacts. Government has the responsibility to protect these groups and help them adapt to the changing climate.

The Consultation Document takes a sectoral approach and assesses how those sectors may be affected by climate change. Vulnerable groups are mentioned only twice, with reference to food resources and human health. The Document proposes examining the impacts of climate change on the food supply chain and food hazards, and researching the effects on vulnerable groups, as well as researching the health and nutrition effects on vulnerable groups (Environment Bureau).

However, after a two-year consultancy study, the Consultation Document still does not explicitly identify who those vulnerable groups are, the details of the impact assessments, or what possible measures will be taken to protect them.

Many other cities or nations clearly define vulnerable groups in their action plans, so that appropriate protective actions could be implemented.

Take England's Heatwave Plan as an example. The Plan identifies the following groups as high-risk groups: the elderly, those who suffer from chronic and severe illness, and those who are overexposed to environmental factors (such as the homeless and outdoor workers).

In OHK's survey, most respondents recognised that the elderly (89.9%), outdoor workers (94.2%), people with long-term illnesses (91.7%) and people living in cubicle apartments (87.4%) are more vulnerable to climate change than other groups.

Take outdoor workers as an example. Outdoor workers are highly vulnerable to climate change impacts. Working outdoors for long hours, they are at risk of heat exhaustion and even heatstroke. The Labour Department provides a two-page leaflet on the prevention of heatstroke at work in a hot environment. However, the effectiveness of this non-legally binding guideline is doubtful. In the summer of 2009, the Hong Kong Confederation of Trade Unions interviewed 295 building workers. About 15 per cent of the interviewees said that they had experienced heatstroke between June and August. About 80 per cent said they were not given extra rest time as recommended in the guidelines issued by Labour Department. About 30 per cent said their employers did not provide them with drinking water. Providing legal protection is more effective, as demonstrated in the United Kingdom, Australia and the municipality of Chongqing in China.

The Government should not miss the opportunity to propose a sound adaptation strategy; it needs to commit to prioritising vulnerable groups and proposing protective measures as soon as possible.

3. Lack of assessment of potential cost implications to vulnerable groups

Many, if not all, climate actions require additional investment on top of what is required under current policies. For example, using non-fossil fuel may increase the cost of energy production and thus may increase electricity tariffs. Currently, the Comprehensive Social Security Assistance (CSSA) does not provide support for electricity consumption. If the tariff increases, it would put low-income families under pressure and they may have to cut down on other expenses in order to pay for higher electricity costs.

Also, with climate change, the challenges to food production and supply are increasing, resulting in higher food prices, and even shortages. These would have immediate impacts on low-income families, which need to be anticipated.

The Government should commit to providing appropriate support to vulnerable groups so they will be cushioned from the additional costs and uncertainties incurred as a result of climate change.

4. Lack of appropriate preparedness and response mechanisms

The Consultation Document proposes periodic reviews of warning, alert and monitoring systems, as well as emergency services and contingency plans. However, it does not give any indication whether or not current contingency plans are adequate to respond to the emerging climate crisis.

If Hong Kong faced a serious heatwave, how would the Government respond? Who would take the lead? Would it be the Inter-departmental Working Group on Climate Change?

These are not purely hypothetical questions. In reality, there is an increasing chance that Hong Kong may face extreme weather events, including very hot weather. In 2009, the Emergency Support Unit of the Security Bureau updated its Contingency Plan for Natural Disasters. This Plan summarises the Government's alert systems and organisational framework for responding to disasters. The Plan covers tropical cyclones, rainstorms, flooding, landslides and tsunamis. However, it does not include dealing with very hot weather.

Currently, when the temperature reaches 33 degrees Celsius, the Hong Kong Observatory will issue a Very Hot weather warning, and the signal will be aired by the media. Some general advice will be provided, but no corresponding response from the various government departments is outlined.

Drawing on the experiences of other countries, we see that there could be a more sophisticated system (a tiered approach) to better prepare society for such an emergency.

In England, there is a National Heatwave Plan to protect health and reduce harm from extreme heat and heatwaves. Although the authorities think there is little risk of a heatwave in England as severe as that in France in 2003 (which resulted in 15,000 deaths), they have prepared a Heatwave Plan because proper preparedness is of the essence; and by the time a heatwave starts, the window of opportunity for effective action is very short (NHS).

The Heatwave Plan identifies the high risk factors and devises a tiered system of four levels:

Level 1: Summer preparedness and long-term planning

Enacted in summer months – social and healthcare services readied

Long-term planning – year-round joint work to reduce the impact of climate change.

Level 2: Alert and readiness

Triggered by Met Office forecasts that there is a 60 per cent chance of temperatures being high enough on at least two consecutive days to have a significant impact on people's health.

Level 3: Heatwave action

Triggered by Met Office confirmation that threshold temperatures have been reached in any one region or more. This requires specific actions targeted at high-risk groups.

Level 4: Emergency

Declared when a heatwave is so severe and/or prolonged that its effects extend beyond health and social care, causing power or water shortages, for example. Illness and death may occur even among the fit and healthy. This requires a multi-sector response at national and regional levels.

The decision to call a Level 4 Heatwave Emergency at National Level would follow a cross-departmental government assessment of the heatwave, and the Civil Contingencies Secretariat (Cabinet Office) would lead on arranging this assessment. The mechanisms at all levels are very clear and are under the leadership of the Cabinet Office.

Toronto, under the Canadian Climate Impacts and Adaptation Research Network, (C-CIARN 2006) has also proactively developed a heat alert system to avoid being crippled by a major heat wave, such as those that hit Chicago (1995) and Philadelphia (1993), both of which killed hundreds of urban residents and hence were an impetus for implementing the Toronto Heat-Health Alert.

5. Lack of high-level political leadership and timelines

The Consultation Document does not assess whether current government organisations or mechanisms are adequate to drive and lead the internal processes within the government and external processes outside the government in managing the impacts of climate change.

Under the current arrangement, the Environment Bureau would lead the Inter-departmental Working Group on Climate Change, which comprises 21 members, including five bureaus and sixteen departments.

A closer look at the terms of reference reveals that one of the duties of this Working Group is to monitor and facilitate adequate adaptation to climate change. Who would lead the formulation of an adaptation policy that cuts across various social aspects? Is it still within the expertise and mandate of the Environment Bureau to lead the internal processes? Currently, the Environment Bureau lacks the institutional capacity to steer policy co-ordination and promote actions to address climate change.

There is a lack of high-level direction in mitigating climate impacts. The mayors of both London and New York provide strong leadership in driving policy formulation. In China, Premier Wen Jiabao heads China's National Leading Group on Climate Change and Energy Efficiency, established in 2007.

The Consultation Document makes no mention of timelines. We do not know how long it would take to conduct a review or assessment. Nor do we know about the scale and scope of this kind of exercise. The Government may take years to conduct research or a review, and another few years to consider policy options. If there is no commitment on timelines, it is hard to see when appropriate adaptation measures will be in place to meet the coming challenges.

6. Business and civil society are not yet part of the climate strategy

What are the roles of the private sector and civil society in combating climate change? The Consultation Document mainly outlines what the Government should do, but includes little mention of the roles of the private sector and civil society.

Meeting the challenge of climate change cannot solely be a government initiative.

In Singapore, the Ministry of the Environment and Water Resources chairs a National Climate Change Committee with representatives from various government agencies, industry representatives, academia, and non-governmental organisations in order to co-ordinate the efforts of all sectors on climate change. It is a platform for policymakers to engage the private and civil sectors on climate change issues and policies, gather feedback and provide the

platform for key stakeholders to debate and share ideas on climate change issues.

In New York, Mayor Michael Bloomberg convened the New York City Panel on Climate Change (launched in 2008), a panel of experts to advise city administrators on issues related to climate change and adaptation. This Panel has assisted the New York City Climate Change Adaptation Task Force, which was established to develop adaptation plans and consists of over 40 public and private sector stakeholders.

Hong Kong currently has no government committee focusing on climate change. There is no formal channel for non-government experts, the private sector and community organisations to engage in and contribute to discussions on climate change solutions. For example, community organisations could be very effective in raising public awareness and providing enhanced community care to the vulnerable groups.

Oxfam Hong Kong's recommendations

1. A strong commitment to produce a risk-based adaptation strategy as soon as possible

Toronto, New York, London, Singapore and other cities have explicit adaptation strategies in place to prepare all stakeholders to adapt to climate impacts. They have adopted risk-based strategies and a “prevent, prepare, respond and recover” framework, with a strong emphasis on protecting their people.

Hong Kong needs to formulate a risk-based adaptation strategy to ensure that we live in a safe and secure place in the coming years.

A sound adaptation strategy should consist of the following components:

- An outline and projection of possible climate impacts
- Vulnerability assessments, especially prioritising vulnerable groups
- A mechanism to “prevent, prepare, respond and recover”, with clear lines of responsibility and timelines
- A mechanism to engage different stakeholders, including the private sector and civil society
- A mechanism to monitor and review policies
- A roadmap to resilience including various consultation processes

The public does not know what kind of assessment of adaptation needs was included in the Government's consultancy, as no details are given in the adaptation section of the Consultation Document. OHK urges the Government to release the full consultancy report so that the public could be more effectively engaged in the debate and in policy formulation.

At the outset of the climate change consultancy, the consultant invited the participation of only a highly select group of companies and civil society organisations, and the level of participation was low.

Later, when the Government formulates its detailed adaptation strategy, there should be a public consultation to include a wider range of stakeholders. In London, the mayor initiated a public consultation on the city's draft strategy early in the process.

Moreover, climate change should be considered part of a broad range of future trends, rather than in isolation. Climate change considerations should be integrated into decision-making and planning at all government levels.

2. Prioritise and protect vulnerable groups in the adaptation strategy

Adaptation is not only about protecting assets and ensuring that businesses operate smoothly. It should aim to save lives and assist vulnerable groups such as outdoor workers, the elderly, children, people living in cubicle conditions, the homeless, and patients with diseases that make them sensitive to temperature changes. Many of these people are also from low-income families.

Overall, vulnerable groups, especially low-income families and individuals, should not have to bear the additional costs incurred by climate measures.

3. Deliver immediate measures

Climate change is already affecting some vulnerable groups, and they need measures to protect them as soon as possible. They cannot wait for years for the Government's research and assessment to be completed.

Immediate measures include:

- Setting up a tiered early warning and response system, especially for hot weather and heatwaves;
- Strengthening protection for outdoor workers;
- Reviewing the current public housing design to ensure it is adequate in the face of emerging climate impacts;
- Evaluating the need to provide public housing for those currently living in cubicles and the homeless

4. Demonstrate high political commitment and leadership

Climate change is not only an environmental issue. It cuts across various social and political aspects, and must involve proactive efforts from various bureaus and departments. Without strong political commitment and leadership, it is hard to foresee that various departments would take proactive steps in formulating the required measures and policies.

OHK recommends that the Government form a high-level climate change working group led by the Chief Executive or the Chief Secretary to formulate a climate change strategy and related policies and co-ordinate their implementation.

5. Engage the private sector, civil society and the public in combating climate change

Various stakeholders should be engaged in both policy formulation and implementation. The Government should set up a mechanism to engage non-government actors to oversee climate change policy, and invite various stakeholders to participate.

6. Explore the setting up of a climate fund to assist developing countries to adapt to climate change

China has committed to acting as a responsible global citizen in responding to the climate change challenges. President Hu Jintao announced in his speech at the 2009 United Nations General Assembly that China would do its best to support other developing countries in adapting to climate change.

As one of the wealthiest cities in China, Hong Kong should explore ways to play a more proactive role in assisting developing countries to adapt to climate change. Hong Kong may explore the feasibility of setting up a “climate change adaptation fund” to help developing countries build their capacity to adapt to climate impacts.

Hong Kong at present provides grants for disaster relief outside Hong Kong through the Disaster Relief Fund (DRF). However, the DRF responds to climate change-related disasters in a relatively reactive manner. The “India Endowment for Climate Change in South Asia”, which the Indian government plans to set up, should provide a good reference point for Hong Kong policymakers.

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