

Consumer Council

Response to Panel on Environmental Affairs – Biodiversity Strategy and Action Plan for Hong Kong

Special meeting on 29 March 2016

1. The Consumer Council (the 'Council') is pleased to provide views on Hong Kong's Biodiversity Strategy and Action Plan (BSAP) to the Panel on Environmental Affairs. The Council believes our views will help Hong Kong consumers understand and reduce the negative impacts of their consumption on the state of Hong Kong and international biodiversity.
2. One of the Council's objectives is to raise consumers' awareness and assist them make more sustainable purchasing and consumption choices. The ultimate aim of sustainable consumption and production is to ensure that future generations of consumers enjoy the same opportunities to buy goods and enjoy recreational opportunities as the present generation enjoys.
3. The Council considers the maintenance of Hong Kong's biodiversity resources as an important concern for society. The Mainland Government has signed the Convention of Biological Diversity and proposed a national BSAP 2011-2030. It is important that Hong Kong plays its part in supporting this global effort to maintain, genetic, species and habitat diversity.
4. The Council's responses to the specific questions are:

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| <ol style="list-style-type: none">1. <i>Question 1:</i> How important do you think biodiversity is, in comparison with other concerns facing our society?2. <i>Question 2:</i> How should we balance the needs of people (for example, adequate housing, job opportunities or food) with the needs of the ecosystem? |
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5. In February, the Council published "*Sustainable Consumption for a Better Future*" which included results from a survey of consumer attitudes to various environmental issues. Consumers were asked to what extent sustainable consumption related to various themes: 63% thought it related to the sustainable use of biological resources, and 62% thought it related to protection of endangered species. This level of support was mid-way in our list, less than support for waste recycling & reduction, energy efficiency and renewable energy, but higher than support for sea water quality, fair wages in developing countries or welfare of farm animals.
6. The publication also set out the Council's views about the role it can play to help make Hong Kong consumption patterns more sustainable. In particular Goal 12 of the UN 2030 Agenda of Sustainable Development – "Ensure sustainable consumption and production patterns" touches on biodiversity. This goal has a range of specific targets including *sustainable management and efficient use of natural resources (12.2)*, *sound management of chemicals and waste...to minimise adverse impacts upon the environment (12.4)* and *...people have relevant information and awareness...lifestyles in harmony with nature (12.8)*.
7. Biodiversity is an important component of sustainability both in terms of the ecosystem services provided by habitats and species, and also the intrinsic value of nature. Despite its population density, Hong Kong has succeeded in establishing an extensive Country Park

system which enjoys a high and unbroken degree of protection spanning many decades. This is a valuable resource for local consumers and tourists. The protection afforded the countryside has prevented habitats in Hong Kong from suffering the degradation, fragmentation and loss in biodiversity suffered in other densely populated areas. Partly as a result Hong Kong is one of the world's biodiversity hotspots and enjoys a wide variety of different marine and terrestrial habitats including shrub-land, lowland forest, wetland, mudflats, coral reef and mangrove.

8. Hong Kong's natural environment provide consumers with recreational opportunities and many ecosystem services ranging from stabilising steep slopes, cleansing water, providing nurseries for fish stocks and habitats for insects and birds that pollinate crop. We do not believe there needs to be a trade-off between maintenance of the natural environment and development of land for housing or food, since there are still brown-field sites that can be developed, or built upon more densely. That said some flexibility can be introduced to allow the co-existence of land use and conservation policy. However, land taxes should be used to increase the cost of developing greenfield sites so it is more expensive than developing brownfield sites. The Council believes the protections provided to natural habitats through laws and zoning should be broadly maintained.

9. *Question 4:* In relation to proposed Action Area 2 (Mainstreaming): The Government currently tries to incorporate biodiversity considerations into its plans and policies. Under this BSAP, it would try to encourage other sectors to do the same. Which sectors are more ready to do this? Which sectors need the most support in adopting biodiversity considerations in their work?

10. We support the ideas proposed in the Mainstreaming section. Hong Kong's stock of biodiversity is not localised just in its nature reserves but is also found elsewhere in its waters and lands. Biodiversity can be negatively impacted by emissions of pollutants, land-use change and physical damage - for instance through activities like trawling. The Government is to be commended for its banning of trawling within Hong Kong waters which is a highly progressive step putting Hong Kong ahead of many other advanced economies. The Government might consider ensuring that pesticides and fertilisers are not misused by farmers. AFCD already produces guidance on the safe use of pesticides and fertilisers. It also operates the accredited farm scheme. Farms that participate in this scheme monitor and restrict their use of pesticides. It might be useful to assess whether there is any evidence of overuse or inappropriate use of these substances is damaging biodiversity.
11. The proposed ideas to integrate biodiversity in hygiene works in rivers and streams should be encouraged. There is also scope for upgrading sewage treatment facilities especially the septic tanks and cesspools used by smaller coastal communities as these can be a major source of pollutants. The consultation suggests there are plans to extend the public sewerage system to the remaining 7% of households who live in villages that are not presently served. We support this policy.
12. Customs and Excise have a role to play in educating consumers and traders and enforcing international conventions¹ to protect global biodiversity, especially the 1200 Appendix 1 species threatened by extinction. Illegal wildlife products are sometimes used in Chinese medicinal, handicrafts and or consumed as food. Customs has a good track record of seizing and destroying illegally trafficked products² like ivory and recommend these efforts are

¹ This is covered by the Protection of Endangered Species of Animals and Plants Ordinance

² An article by Traffic document the substantial seizures and destruction of confiscated ivory <http://www.traffic.org/home/2014/5/14/ivory-trade-hot-spot-hong-kong-plans-huge-ivory-stockpile-bu.html>

maintained. We welcome the new announcements made by the Chief Executive in his 2016 Policy Address strengthening anti-illegal trade measures and increasing protection for endangered species. Penalties for illegal activities should be periodically reviewed and increased to ensure illegal trade does not violate international conventions.

13. *Question 5: With reference to proposed Action Area 3 (Knowledge): We have identified various gaps in our knowledge of biodiversity in Hong Kong. We need to fill them to facilitate stakeholders in making informed decisions. In your opinion, which of these gaps should we focus on in the coming five years?*

14. The Council supports the Government's ideas for improving the cataloging of information and monitoring the state of biodiversity within Hong Kong. In this section the Council also comments on how knowledge needs to be communicated to young people and consumers to influence unsustainable demand for rare and endangered species.
15. Public awareness of biodiversity: it is important that people, both young and old people, develop awareness and sensitivity towards the natural environment so they better understand society's reliance on nature, and cultivate an aesthetic appreciation. One way of doing this is by encouraging school children to undergo immersive experiences in the countryside observing and learning about nature. We support the inclusion of such education and a broader understanding of sustainable consumption in school syllabi.
16. Consumption by older people can also have an important impact on global biodiversity – particularly consumer preferences for rare and endangered species either for use in traditional medicine, handicrafts or consumed in fine dining. As Hong Kong continues to become more affluent there is the risk that if left unchecked such consumption pressures could rise. The use of rare and endangered species for traditional medicinal uses often has little scientific basis and such drugs can be less effective than modern drugs and treatments. It is important that consumers do not put unsustainable demands on biodiversity either to garner social prestige or for unsubstantiated medical reasons. It is important that efforts are made to reduce demand by educating and informing consumers about the damage consumption of some goods pose to endangered species and habitats. Government has a part to play, but also other trusted stakeholders within society like professional bodies and learned societies.
17. Quantifying overseas biodiversity impacts: on a per capita basis Hong Kong consumers are one of the world's largest users of fish and timber including, regrettably, many rare and even endangered species. Some inroads are being made in changing attitudes about consuming rare species such as views about shark-fin, but more needs to be done to educate consumers about the impacts of their demand has on unsustainable fishing and trade practices. Government is playing a leadership role through its prohibitions on consuming shark fin at events officials and ministers attend or arrange. We commend this and hope it is extended to consumption of other endangered or rare animals. The Council is aware that the theme of education and awareness is being addressed by the Council for Sustainable Development (CSD) in its public engagement exercise on biological resources. It is important that CSD and the BSAP interact to ensure no gaps in coverage.
18. Adverse biodiversity impacts can also arise through the supply chains of imported goods like cotton: grown in water scarce zones, oil palm: grown in newly cleared virgin forest, fish: produced using dynamite or poison and certain mining operations. Some businesses adopt more sustainable practices. This issue was picked up under recommendation A12 by the Awareness Mainstreaming and Sustainability Working Group: "*Engage stakeholders to assess and address Hong Kong's ecological footprint*".

19. The Council advocates the Government undertaking a study to systematically measure trends in the flows of materials and foods (biological: fish, timber, plant derived: like cotton, grain) into Hong Kong and if possible identifying the region of export to ascertain whether imports give rise to habitat destruction. The CSD's Public Engagement on Biological resources might be a good platform to trial such an assessment of overseas impacts for a limited range of products / locations.

20. *Question 6:* With reference to proposed Action Area 4 (Community Involvement): The Government and non-governmental organisations have taken a number of initiatives to promote biodiversity and nature conservation. In your opinion, which of these have been most successful? Can you suggest how we could improve them? Do you have other ideas?

21. Certification schemes: Consumers have the right to trustworthy and accurate information at the point of sale to help them choose products that reduce the unnecessary release of phosphates, nitrates, pesticides and GM foodstuffs into the environment. This will improve the quality of water ecosystems, lessen eutrophication and help biodiversity. The Council has undertaken surveys over the years which highlight the presence of excessive levels of substances harmful to biodiversity³ like pesticides and GM residues.

22. Consumers would like to determine whether there are using goods that contribute to the problem or help solve it. While there are a number of certification schemes that indicate whether fish or timber products are produced from sustainably managed fisheries / plantations not all the schemes are equally good. In the most recent issue of Choice pesticide residues were even found in produce marketed as Organic.

23. Such certification schemes are produced by non-Government bodies. The Council is strongly supportive of such initiatives. But more needs to be done to ensure they operate to high standards and to increase patronage so to bring the price premium down. One means of doing this is by Government playing a part by recognising and rewarding schemes that identify products that enhance global biodiversity.

24. Government is already playing a supportive role by greening its public procurement⁴. Public agencies are already favour greener products over less green goods. Currently the criteria include recyclability, energy and water efficiency, avoid use of toxic substances. The criteria might be extended to include certification for sustainably produced goods that contribute positively to global biodiversity. Some schemes already exist covering sustainably managed timber, paper pulp or oil palm that replant and avoid excessive use of chemicals – such as Hong Kong's own Accredited Farm Scheme.

25. The Council aims to undertake studies to help consumers discriminate between good and less good certification schemes and is keen to work with other organisations and the Government to provide information to consumers to promote adequate biodiversity and nature conservation.

³ Choice # 473 (15 March 2016) 37% Vegetable Samples with Organic Claim with excessive pesticide residues

Choice (April 6, 2011) Product recall of a proprietary Chinese medicine

CHOICE # 349 (November 15, 2005) Unregistered pesticide active ingredient detected in eleven mosquito coil samples

Choice # 294 (12 April 2001): Small traces of heavy metals, pesticide residues in ginseng products but no cause for undue concern

CHOICE # 438 (April 15, 2013) GM Food Test – GM residues found in samples of imported corn products

⁴ http://www.epd.gov.hk/epd/english/how_help/green_procure/green_procure.html