

Biodiversity Conservation Division
Agriculture, Fisheries and Conservation Department
The Hong Kong SAR Government
6th Floor, Cheung Sha Wan Government Offices
303 Cheung Sha Wan Road
Kowloon, Hong Kong

7 April 2016

Dear Sir/Madam

Policy Submission on the Proposed Biodiversity Strategy and Action Plan

Views from Business Environment Council Limited 商界環保協會有限公司

Over the last two decades, Business Environment Council Limited 商界環保協會有限公司 (“BEC”) has taken a leading role in advocating the business case for environmental excellence in Hong Kong. Our members are committed to actively engaging with the HKSAR Government (“the Government”) on a range of issues relating to the environment and sustainability.

BEC is an independent charitable membership organisation comprised of approximately 200 member companies ranging from major holding companies to small and medium-sized enterprises in Hong Kong. Views expressed in this submission are those of BEC, and are based on consultation with our members, but may not necessarily be the same as the position of each individual member.

BEC welcomes the HKSAR Government’s plans to put in place a Biodiversity Strategy and Action Plan (“BSAP”). We support the overall mission and vision and the four action areas, which we recognise seek to improve on the achievements of Hong Kong to date in protecting its natural environment.

We regard biodiversity as being the foundation of a healthy natural environment that provides food for people to eat, clean water to drink through the protection of water catchments, and clean air to breathe. A healthy natural environment also provides attractive green leisure space contributing to the health and well-being of residents. We regard biodiversity protection as part of the bigger picture of sustainable development and from the perspective of the consumer and the business community respectively, sustainable consumption and production.

We suggest some improvements and enhancements to the BSAP in relation to the specific actions under these action areas, with reference to your questions, and also in support of a broader focus that comes from treating biodiversity protection as part of the bigger picture of sustainable consumption and production.



Questions in Consultation Paper

1. How important do you think biodiversity is, in comparison with other concerns facing our society?

BEC regards biodiversity as essential for healthy local ecosystems that support a natural environment which provides a range of benefits for the city's residents, and is therefore of fundamental importance. The benefits include: the capacity to produce food, not only on Hong Kong's land but also the fish and shellfish which live in our marine areas; the benefits of trees that store carbon, reduce the heat island impact, slow rainfall run-off and help clean the air; as well as healthy green spaces that provide pleasant and natural spaces for leisure activity which enhance the city's liveability.

Protecting and enhancing our biodiversity to secure healthy functioning ecosystems is essential to secure our "natural capital", protecting ecosystem services for future generations. Furthermore, as Hong Kong is particularly well-endowed with biodiversity lying within the Indo-Burma Hotspot, one of 35 global biodiversity hotspots, protecting our ecosystems is of wider global value.

2. How should we balance the needs of people (for example, adequate housing, job opportunities or food) with the needs of the ecosystem?

BEC believes that healthy ecosystems support the needs of people. They are connected in a positive way, as explained above, rather than being in opposition to each other. They provide business opportunities, such as eco-tourism in Hong Kong and a local supply of sustainably produced vegetables and seafood. Educating the community so there is a good understanding of this relationship is important.

There will be some circumstances where there are tensions, in particular between construction-related development and biodiversity. To balance these needs we support the current legal and planning framework which we believe the BSAP could usefully improve on. In particular, we would like to see commitments to clear criteria for the designation of sites that fully take on board biodiversity (as well as leisure and amenity), research into species that require greater levels of protection¹, ensuring the policies of all Bureaux take on board biodiversity, and continued and transparent efforts to identify brownfield land for development engaging business in the process of doing so.

3. In relation to proposed Action Area 1 (Conservation): Conservation measures in Hong Kong have yielded some positive results. With regard to our programme so far launched, what do you think are its strengths? How could it be improved?

We support the proposals in the draft BSAP to improve on Hong Kong's system which yields major benefits in terms of health and well-being and is recognised as a good high density model of urban development, and suggest some enhancements below.

¹ For example at present there are no marine species in the list of protected species.



To secure areas of high ecological value, for those areas already identified for protection in the BSAP, we recommend communicating a clear timeline for their designation. For the purposes of any additional areas to be designated, for example new marine protected areas, we recommend that the current designation criteria are made clear and transparent, and are supplemented to fully take on board biodiversity and opportunities such as eco-tourism value².

We suggest the government also explores the feasibility of establishing a framework to reduce the impact of building homes and other development, by providing for land of high ecological value to be protected in exchange possibly for allowing development to a higher plot ratio on land of lower ecological value³, whilst ensuring that leisure and amenity value are also taken into consideration.

In terms of managing protected areas, we welcome the proposed development and review of management plan. We recommend that these plans systematically address threats and opportunities such as those arising from climate change, for example, forest fires and ocean acidification, as well as water pollution, and are supported with adequate funding.

As for urban greening, beyond current approaches, we recommend consideration of further policy and projects to support urban biodiversity. These could include policy support for enhanced roof and podium gardens, wildlife corridors for birds and butterflies linking up parks and open spaces, and projects such as the rehabilitated Tsui Ping River in Kowloon East, the proposed raised plaza in Hung Hom and pathways along Victoria Harbour. These measures offer wider benefits like increased opportunities for exercise, walking and cycling.

Considering the size of the city and its trading role, we recommend that the impact of consumption on biodiversity be explored, measures be considered to reduce these impacts, and the risks of inadvertently participating in the illegal wildlife trade addressed. Relevant measures may include promotion of green procurement and environmental labels concerning biological species such as palm oil and seafood. For endangered species, we support action by Customs & Excise not only to enforce the Convention on the Illegal Trade in Endangered Species (CITES), but also to provide information to the import & export and logistics sector. This is a key part of treating biodiversity protection as part of the bigger picture of sustainable consumption and production, and we encourage the Government to work with the business community to support the supply of sustainably produced products and services.

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?

² BEC notes from the stakeholder engagement exercise in 2014/15 and Civic Exchange research that marine protected areas only cover a small proportion of Hong Kong marine areas (about 2% in comparison with 30% in Australia <http://www.marinereservescoalition.org/resources/marine-reserves-around-the-world/australias-marine-protected-area-network/>) and that it may be that lowland areas are under-represented in country parks. http://www.afcd.gov.hk/english/conservation/con_bsap/bsap_consultation/files/Final_Report_Red_List_FG.pdf. http://www.hkbws.org.hk/web/chi/documents/report/HK_Headline_Indicators_for_Biodiversity_Conservation_EN.pdf

³ This could involve an independent third party like the National Trust in the UK taking charge of land of high value, currently held in developers' landbanks, along with a sum of money for its management.



We support incorporation of biodiversity considerations into policies and strategies of Government bureaux/departments, particularly the Development Bureau, Housing & Transport Bureau, and Leisure and Cultural Services Department. We encourage enhancement of current practice with a consistent transparent strategic environmental assessment⁴ process that strengthens our evidence-based approach, increasing certainty and minimising risks of legal challenge.

We welcome the encouragement of incorporation of biodiversity considerations into plans and policy development in business sectors, such as property development, construction, utilities, transport & logistics, fisheries and agriculture, and those supply chains with implications for sustainable consumption. Setting clear parameters and sufficiently ambitious standards through planning policy (Hong Kong Planning Standards and Guidelines), as already identified in the BSAP, helps create a level playing field. To encourage the adoption of biodiversity considerations by business sectors, the creation of financial incentives, voluntary guidelines and resources on best-practices may also be relevant.

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 5 years?

To enhance decision-making, we support research into the areas set out in the proposed BSAP, in particular into: local ecosystem services provided by biodiversity; keystone and functionally important species; and fishery resources. We would suggest the prioritisation of research into the threats and risks from climate change, such as ocean acidification and higher land and sea temperatures⁵, and water pollution within the PRD. Research should also explore and identify opportunities, such as eco-tourism and biotech. The government may wish to consider a stakeholder platform to help identify research priorities and funding allocation.

Such research data and outcomes of research are crucial for the future development of BSAP. We suggest a systematic approach to archive, share and disseminate research data and outcomes. Currently, such research data and outcomes are often scattered in the public domain. Sharing the data with other government bureau and the public facilitates a collaborative effort in the accumulation of knowledge and can contribute to better decision-making in the future.

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?

We support greater engagement with business and the community on protecting and enhancing biodiversity and conservation, to ensure an approach that can be sustained over the long term

⁴ The EU Strategic Environmental Assessment Directive requires this approach in the EU.

⁵ Research reports suggest a gap in relation to studies on climate impacts.

https://www.researchgate.net/profile/Reg_Watson/publication/227618489_Projecting_global_marine_biodiversity_impacts_under_climate_change_scenarios/links/09e4150f12a9c72454000000.pdf



as a result of a shared vision. We are particularly supportive of educational initiatives of a “citizen science” or experiential learning approach, both educational and empowering, in particular for students. For the wider community including business, we recommend consideration of projects along the lines of the Singapore’s Gardens by the Bay as well as promoting the existing botanical and zoological gardens, to stimulate an interest in and understanding of biodiversity whilst also providing local tourist attractions. For other sections of society, for example the older age group television programmes featuring local biodiversity may be a better way of communicating. For the business community, case studies based on real world examples that illustrate and make the business case for biodiversity protection and enhancement are encouraged.


In addition, we support engagement around the broader concept of sustainable consumption and production, which has the advantage of more clearly communicating the role of business and consumer in protecting and enhancing our natural environment. It also takes on board the interconnectedness of one territory with another. For example, the Hong Kong community has an interest in protecting tropical forests in countries like Indonesia because of air quality, carbon emissions and species for medical research.

Conclusion

In conclusion, BEC recognises the good work done by the Government to date in protecting Hong Kong’s natural environment and supports the Government in its aim to continue this work, making some suggestions as to how the proposed framework can be enhanced.

Thank you for considering and taking on board our policy submission. If you have any questions, please contact our Chief Executive Officer, Mrs Christine Cheung on christinecheung@bec.org.hk.

Yours sincerely,



Professor John Chai
Chairman
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