



嘉道理農場暨植物園公司
Kadoorie Farm & Botanic Garden Corporation

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27th March, 2015.

By email only

Dear Sir/ Madam,

Comments on New Agricultural Policy:
Sustainable Agricultural Development in Hong Kong

Executive Summary

1. A more clearly defined goal for the new agriculture policy is needed. The goal of the agriculture policy should be set to, ‘encompassing proactive support to sustainable agriculture and maximising the contribution of the food system to the well-being of the present and future generations in Hong Kong’.
2. Conservation of existing farmland (both active and abandoned) for sustainable agriculture should be set-out as the top agenda item in the new agriculture policy to eliminate the chance of other factors eroding this most important and fundamental resource. A more specific and rigorous zoning for cultivation should be in place in the land use planning system, and should be implemented (e.g., through re-zoning); this can prevent incompatible land uses (e.g., Small House development) further eating into and continuously reducing the area of arable lands.

We also recommend that the authority increases the size of the proposed Agri-Park, and modifies the Agri-Park initiative into an instrument with which to mitigate for unavoidable loss of agricultural land due to other development initiatives (the ultimate target should be to protect the total acreage of the existing farmlands (4,523 ha)). It is also essential to impose ‘sustainable’ criteria (e.g., those from European Union/ Convention on Biological Diversity) to govern the development of the Agri-Park concept – long-term conservation of agricultural resources including soil, land and ecosystem services. This Park does not need to be developed on just a single piece of land or in a single location; it can be divided into or be envisaged as a mosaic of separate units and be set-up in strategic locations to act as buffers between the urban landscape and protected areas (e.g., Country Parks). In addition to food production, multiple

benefits can also be achieved by doing this e.g., landscaping function, buffering function, regulating micro-climate, providing green, open space and passive recreational places for nearby citizens, protecting biodiversity, creating wildlife corridor. All these benefits can enhance the well-being of the entire society.

3. The Sustainable Agriculture Development Fund (SADF) should focus on promoting ‘sustainable and appropriate’ technologies that improve general farmers’ livelihoods, and, maximize social and environmental benefits of sustainable agriculture. Fund allocation should be governed by a clear set of sustainability criteria rather than having a bias towards ‘modern’ technologies – public money must be spent properly for the sustainability goal instead of benefiting investors or agri-businesses engaged in selling and making questionable modern technologies (e.g., hydroponics).

4. To upgrade agriculture in Hong Kong, we need to re-brand local agriculture with a new approach to focus on its multi-fold social benefits, not just on its products. We support the recommendation in the consultation document that weekend Farmer Markets can be held more frequently and in more districts. There should be a clearly stated target to set-up at least one regularly-operating weekend Farmers Market in each of the 18 districts of Hong Kong.

5. We need a clear target to work towards if we are determined to advance agriculture for the benefit of the current and future generations in Hong Kong. Given that the current quantity of fresh food production in Hong Kong is exceptionally low in comparison to our rich agricultural resources, it is practical and realistic to set as a mid-term quantitative target a doubling of the quantity of local production within a 3-year time period.

6. We are highly concerned that ‘leisure farms’ and ‘on-farm domestic structures’ will be subject to abuse and, eventually, much arable land will be trashed by such developments. We recommend that new guidelines should be set-up to control and regulate these items, in order to ensure that they would not serve as a stepping stone for more aggressive or creative marketing of real estate developments (e.g., permanent residential housing labeled as homesteads or farmsteads).

Comments on New Agricultural Policy:
Sustainable Agricultural Development in Hong Kong

1. We welcome the Government's initiative to review the agricultural policy in Hong Kong. The consultation document entitled '*New Agricultural Policy: Sustainable Agriculture Development in Hong Kong*', rightly points out that a new policy encompassing more pro-active support to sustainable agriculture in Hong Kong is needed, so as to maximise the contributions of agricultural development to the well-being of society as well as being a source of primary production.
2. There is an escalating awareness of the vulnerability of cities to the challenges of population growth, Peak Oil¹ and Climate Change², and the threat of food security and safety. Ever-increasing issues of concern related to environmental, social and economic sustainability are leading municipal governments worldwide to think more creatively about how to greatly increase community resilience and livability, in relation to food and urban sustainable agriculture.
3. The consultation document and a government press release³ also point out that the benefits of sustainable agriculture include conservation of natural resources and enrichment of biodiversity. Indeed, the Secretariat of the Convention on Biological Diversity has stated that: '*Sustainable agriculture seeks to make use of nature's goods and ecosystem services while producing an optimal yield in an economically, environmentally, and socially rewarding way, preserving resources for future generations.*'⁴ We consider that this should be one of the core guiding principles of the policy.
4. The threats and damage to agricultural resources especially conversion of valuable farmland to other uses has intensified in Hong Kong over the past two decades despite the fact that community demand for sustainable agriculture has been growing sharply. Now is the critical time for Hong Kong to develop a visionary policy to retro-fit local agriculture to

¹ <http://postcarboncities.net/node/127>

² <http://www.oecd-ilibrary.org/docserver/download/5kzssgshj742.pdf?expires=1395906568&id=id&accname=guest&checksum=24BD0D49CB61541AD93C28714050F665>

³ <http://www.info.gov.hk/gia/general/201412/29/P201412290342.htm>

⁴ <http://www.cbd.int/ibd/2008/sustainable-agriculture/default.shtml>

address today's challenges, to enhance the well-being of the present and future generations in Hong Kong. It is still possible but we must act fast to undertake new policy directions and underpin this by implementing appropriate strategies and taking proactive measures to counter the rapidly vanishing agricultural resources of Hong Kong.

Focusing on the core factor – agricultural land

5. The statistics stated in the consultation paper show the fading of local agriculture in terms of production, number of farmers, cultivated area and market share – these data have brutally proven that the existing agricultural policy has failed and we need substantive changes.

6. When compared to limited investment, shortage of farmers and technological limitations, the most important single factor that has driven our agriculture sector to shrink in scale in the past two decades has been the issue of **access to farmland**. Land is the fundamental resource for sustainable agriculture. Measures to stipulate that land zoned 'Agriculture' ('AGR') must be used for active agricultural use ONLY is absent from our existing agriculture policy which passively allows market forces to use the land for short-term financial profits such as operating open storage container yards, car repair and car-breaking facilities, and, property development. These inappropriate uses out-compete agriculture. Allowing inappropriate uses cultivates the 'hope-value' held by property developers/speculators and private owners of agriculture land – the expectation that at some time in future the agricultural zoning would be dropped and there would be development opportunities with fortunes to be made for a few people. This hope value drives up the agricultural land price and forces farmland to lie 'abandoned'. Apart from displacing farmers, it makes agriculture an 'unaffordable' and 'impossible' occupation for new farmers.

7. The Government-led NENT Development Plan, for example, is proposing to take over 82% of the agricultural land of the site. Across Hong Kong, nearly 1,000 ha of agriculture land is held by just a few major developers⁵ in their land reserve and they have no intention of farming it or allowing others to farm it – but this land is needed and demanded by the people for active agriculture.

8. The Agricultural Land Rehabilitation Scheme set up by AFCD in 2009 benefited only 83 farmers out of the 246 applications in 2009-2013. By early 2014, the waiting list had increased to 258 applications – most of whom are farmers who have been displaced by various land

⁵ Ming Pao Daily, 2013.1.7 <http://edu.sina.com.hk/news/140/4/1/127563/1.html>

development projects.

9. Our new agriculture policy must target and address the land-use problem with proactive measures to safe-guard all currently-active farmland and, also, safe-guard the remaining currently fallow agriculture land of high agricultural quality/ potential to be used for sustainable agriculture only. We, thus, support one of the government's recommendations – resumption of land for setting-up an 'Agricultural Park (Agri-Park)' but we consider that the size of this proposed 'Agri-Park' (around 80 ha) is far too small to be of any realistic practical function. In order to make the proposed Agriculture Policy (i.e., promoting 'sustainable agriculture development') to become practically implementable and the goals (e.g., enriching biodiversity and conserving natural resources) to be achievable, much of the remaining agriculture lands (around 4,500 ha) beyond the proposed 'Agri-Park' must be protected and must not be turned into non-arable (e.g., concrete-paved) areas. Otherwise, the well-intentioned viewpoints mentioned in the consultation document are just simply wishful thinking and empty words. We also consider that the 'Agri-Park' concept does not need to be solely confined to a single piece of land. There are many good quality farmlands distributed throughout the rural areas of Hong Kong and they are scattered in different districts and different locations. The authorities should strategically identify suitable areas in different districts to set up 'multiple Agri-Parks'. The reasons for doing this are stated in Section 21 of this letter.

10. Furthermore, the new agriculture policy should explicitly state, adopt and promulgate soil conservation principles and measures to protect the integrity and structure, sustainability and regeneration of arable farmland soils and the essential landscapes of the surrounding watersheds serving those farmlands.

We need sustainable agriculture, not modern agriculture

11. Chapter 3 of the consultation document acknowledges the benefits of the local sustainable agricultural industry; these 'other benefits' are more important than the food alone. Maximising agriculture's multiple benefits for the well-being of the society is set as the goal of the new agriculture policy.

12. However, the strategies stated in the consultation document wrongly portray modernisation as being equivalent to sustainability. However, these are two completely different directions. It also misleads readers into assuming that modernisation is the only option for advancing agriculture. More importantly, 'modern' agriculture does not commit to

the sustainable goals as set-out in the consultation document.

13. In fact there is no shortage of criticisms of modern agro-technologies since many Green Revolution methodologies have created extensive environmental damage, ruined farmers' self-reliance and their capacity to cope with the changes in the environment. A blind worship of modern agriculture technology without a critical assessment of its damaging effects upon natural environments and appropriateness with respect to the local cultural and environmental factors in attaining sustainability will not only be wasteful of public resources but will also irreversibly jeopardise the opportunities for developing a truly sustainable agricultural sector in Hong Kong.

14. Hong Kong should make reference to international standards for defining the goals of sustainable agriculture. For example, the European Union (EU) defines the aims of sustainable agriculture⁶ as to:

- Produce safe and healthy food
- Conserve natural resources
- Ensure economic viability in helping farmers to generate enough income to maintain a livelihood
- Deliver services for the ecosystem
- Manage the countryside
- Improve the quality of life in farming areas, and
- Ensure animal welfare

15. In addition, the Secretariat of the Convention on Biological Diversity (CBD) also states that sustainable agricultural management aims to⁴:

- Use water, land, nutrients, and other natural resources effectively or at the rate they are replenished so that resources are conserved, for example, using water effectively means taking into consideration other ecosystem services that water provides (flood mitigation, nutrient cycling, drinking water supply and sanitation)
- Manage biodiversity in such a manner that biological resources are sustained, for example, maintaining wild relatives of crop species within agricultural landscapes (woodlots and hedgerows) sustains biodiversity

⁶ http://ec.europa.eu/agriculture/events/2012/rio-side-event/brochure_en.pdf

- Minimise the impact of agriculture on the wider environment in order to sustain the other ecosystem services such as, minimising chemical inputs especially non-renewable sources, so that there is minimal damage to the surrounding ecosystem.

16. Examples of modern agri-technologies that are in doubt include hydroponics, and yet, hydroponics is highlighted in the consultation document as a way forward. It is a technology that can produce food without soil but it is done at a high environmental cost (energy intensive for illumination and environmental control) and economic cost (capital and operational). Only people who are rich can enjoy its products. With reference to the demonstration facility set-up by the Hong Kong Vegetable Marketing Organisation (VMO) as an example, the reported production cost of lettuce is HK\$300/kg and has a selling price of HK\$400/kg – this is unaffordable food for local citizens, generally. Lettuce produced by cultivation in soil by a farmer using sustainable agriculture methods is 10X cheaper with a selling price of just HK\$40/kg. If the hydroponics operation is a purely money-making business targeting the high-end market sector rather than yielding social benefits or sustainable goals, then fine, but it should not be called or labelled as sustainable agriculture. It is highly inappropriate to spend the public money of taxpayers in the Sustainable Agriculture Development Fund (SADF) on such obviously non-sustainable farming operations. Quite simply, hydroponics is, in fact, a highly mechanised food-factory system operating within an enclosed, soil-less, controlled and completely sterile laboratory environment – it does not need to be, and actually should not be built on soil. Should the Agri-Park be set-up on agricultural land, hydroponics should never be a technology for consideration within such an area as it destroys the most fundamental agriculture resource, i.e., soil. Hydroponics lives in industrial estates. However, it seems that there should be a review of existing building laws and regulations by the relevant authorities (e.g., Building Department, Lands Department) to ensure that hydroponics and other types of so-called modern agri-technologies are permitted in industrial estates and buildings. If such modern-agri-technologies are not permitted within the existing sets of land-use or building rules and guidelines, then the legal regulations will have to be amended before such agri-technologies can bear fruit in the industrial estates of Hong Kong.

17. The consultation document, and also, the Secretary for Food and Health have already stated that enhancing biodiversity is one of the aims of the new agricultural policy. In 2011, the CBD was extended to Hong Kong. If the actual objectives of ‘sustainable agriculture’, as outlined above, are to be strictly followed; the CBD’s principles are being respected and ‘enhancing biodiversity’ is to be emphasised, then, simply speaking, arable lands must be protected for soil-based, organic cultivation, and cannot be turned into ‘concrete-based’

farmlands (e.g., mushroom houses or hydroponic farms).

Convention on Biological Diversity and sustainable agriculture

18. The document highlights ‘sustainable agriculture’ as the gist of the Policy but what is actually being promoted in the document is far from our understanding of ‘sustainable agriculture’ practices. Indeed, the CBD has already provided rigorous guidance on sustainable agriculture (as mentioned in Section 15). If genuine sustainable agriculture is to be promoted, then we consider that Government can simply make reference to the relevant requirements/recommendations from the CBD. This can also help Hong Kong to fulfill its obligations under the CBD and to meet the Aichi Targets. The draft Policy however, does not even mention the CBD. We recommend that the Policy be re-drafted so as to facilitate meeting our international obligations. The Aichi Targets and CBD’s articles related to the Policy are described, as below.

19. Aichi Target 7 states: ‘By 2020, areas under agriculture, aquaculture and forestry are managed sustainably, ensuring conservation of biodiversity.’ Hong Kong now, has obligations to sustainably use our natural resources. Hong Kong can better meet its obligations by conserving farmland and promoting genuine sustainable development via farming practices which are environmentally sound.

20. Aichi Target 3 requires that: ‘positive incentives for the conservation and sustainable use of biodiversity are developed and applied...’ Clearly, land resumption is capable of delivering such benefits for sustainable use of natural resources such as genuine environmentally-friendly farming, and, so, we strongly support the use of administrative and statutory instruments to resume land for setting-up the ‘Agri-Park’ concept. But as previously mentioned, the proposed size of this Park is far too small to be meaningful and we do not consider that it must be just ‘one single Park’; there can be numerous ‘Agri-Parks’ in different districts/ locations strategically distributed throughout Hong Kong (see below).

21. Farmlands can be considered as managed landscaped areas (i.e., green, open space), and can also be passive recreational places (e.g., leisure farms). If they are managed and operated in a really sustainable way (e.g., organic farming, agroforestry), these farms can also help protect good quality soil, pure water, clean air and the biodiversity of a wider area can also benefit – functioning as buffers between the urban landscape and Country Parks, acting as wildlife corridors between protected areas, and, at the same time produce safe food. The CBD’s Article 8(e) states that the contracting party shall: ‘promote environmentally sound and

sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas'. We consider that the setting-up of Agri-Parks with specific guidelines and requirements (e.g., organic farming, agroforestry) in strategic locations (e.g., between urban areas and Country Parks, Country Park Enclaves) can easily fulfill this objective. The Agriculture Branch of the AFCD needs to be guided by the Environment Bureau and Conservation Branch, and to work closely with the Development Bureau, so that the multiple benefits as listed above can be integrated and achieved in as broad a manner as possible for the overall integrity of our countryside.

Social well-being – or profit-making only?

22. The consultation document also emphasises the importance of commercialisation and ‘upgrading’, and (tries to) link this up with ‘modern’ technologies. While we have already criticised the over-emphasis of these technologies in the above paragraphs, we would also like to point out that we should not over-emphasise commercialisation. Most of the farms now operating in the rural landscapes of Hong Kong are small-scale and the average farm size is about three ‘dau chung’ (0.2 ha), and many are also family-based units (**Figure 1**). Many of these farms have been practicing traditional farming for decades (**Figure 2**) and it would be almost impossible, and inappropriate, for them to become highly-commercialised/ highly-modernised/ ‘upgraded’. We consider that the consultation document has not taken into consideration the real-life circumstances or highlighted any new, practical solutions to look after or sustain the well-being of these existing farms or farmers. The ultimate existential problem they are facing now, as mentioned above, is, quite simply, the shortage and security of arable land (**Figure 3**). Without a secure piece of land or land tenure for practicing farming, how can the farmers consider upgrading or investment for further commercialisation? By ignoring this fundamental flaw related to lack of land security or tenure but at the same time promoting the notion of “upgrading” is just putting the cart before the horse. As aforementioned, the Government is exploring the opportunity of setting up an Agri-Park but its size would only be about 70 – 80 ha. We would like to state that it is far from adequate to provide any practical means to look after existing farms and farmers – currently, the area of active vegetable farms in Hong Kong is about 298 ha; if this land produces only 2% of the vegetables (16,300 tonnes) consumed in Hong Kong in 2013, a so-called Agri-Park of 70–80 ha would only provide an extra 0.5% of Hong Kong’s vegetable needs. Hong Kong needs to get the whole of the remaining 4,523 ha of agricultural land back into production.

23. Furthermore, if we assume that land in the Agri-Park is to be granted for use by the displaced farmers on the waiting list of The Agricultural Land Rehabilitation Scheme which

has increased to 258 applications (by early 2014), then all of these farmers would need about 52 hectares of arable land (assuming 0.2 ha average farm size x 258), representing about 65% of the area of the proposed Agri Park (80 ha). The proposed Agri-Park is already almost filled up by farmers on an existing waiting list. Will there be sufficient space leftover to accommodate farmers who are displaced in the future or new-comers who wish to enter the farming business as well as all those future enterprises that are planned to be inserted into the Agri-Park? Will each and every farmer be limited to a size of farm plot which does not exceed 0.2 ha in size? What if there are farmers who have the proven skills and capability to individually farm a parcel of land that is 5 ha or more in size? Under such a scenario, how many of these farmers can a small 80 ha Agri-Park accommodate?

24. The agricultural land utilisation data as set-out in the annual reports of the Agriculture and Fisheries Department⁷ or the Department of Agriculture, Fisheries and Conservation⁸ show that Hong Kong has already lost about 60% of its farmland area in the past 50 years. As shown in the consultation document, in 2013, and mentioned above the market share of fresh vegetables produced in Hong Kong was only about 2% of the local demand. This is far from ensuring food security for the people of Hong Kong. Indeed, the food self-sufficiency rate of mainland China is also dropping^{9, 10}, but currently most people in Hong Kong including the Government seem to be unaware of or unconcerned about this phenomenon. A Hong Kong scholar has already reported that the present reality of food production in Hong Kong is not desirable¹¹.

25. We would also like to mention that Hong Kong is currently unprepared for the effects of Climate Change and Peak Oil which are likely to be severe. Peak Oil is the tipping point of global oil production which, according to economists, will be followed by a period of price instability and then an ever-decreasing flow of supply and ever-increasing price hikes, leading to economic and social instability; and is considered by leading analysts to have already arrived – the effects temporarily delayed by the environmentally damaging and non-profitable

⁷ Agriculture and Fisheries Department. 1961. *Annual Departmental Report 1960/61*. Hong Kong Government, Hong Kong.

⁸ Department of Agriculture, Fisheries and Conservation. 2012. *Department Annual Report 2011-2012*. Hong Kong Special Administrative Region Government, Hong Kong.

⁹ <http://gd.people.com.cn/BIG5/n/2015/0208/c123932-23828428.html>

¹⁰ <http://news.takungpao.com.hk/mainland/focus/2013-08/1826632.html>

¹¹ <http://hk.apple.nextmedia.com/news/art/20130513/18258255>

fracking industry. Climate scientists in Hong Kong, Mainland China and elsewhere predict food shortages in the coming years due to climate change in China. Hong Kong's food supply is also heavily reliant on the supply of cheap oil and gas, which is used in the production of fertilisers and pesticides, and of course, which is needed for food transportation and refrigeration. We consider that "food security" is a very serious and fundamental issue, and, that the Government has a responsibility to take all possible steps to protect and conserve Hong Kong's active, abandoned and illegally degraded agricultural lands so that there is a chance of Hong Kong having increased resilience in the future.

26. Stable food supply is a very important public interest – history shows us that without affordable, available food civilised society tends to collapse very quickly. In order to safeguard our capacity and potential for sustainable food production and stable food supply both for the present and into the future we should conserve our remaining agriculture areas, and the area of agricultural land in Hong Kong should not be further reduced. Clearly stated targets, objectives and a food self-sufficiency rate need to be formulated and articulated, and measures implemented to meet these targets and objectives within specified time-frames. This can help protect the livelihoods of those existing farmers who possess the skills and knowledge and can also secure land for new farmers who wish to practice farming as a way of life.

27. Finally, re-cycling food waste has become one of the major goals of the Government. While in many countries food waste would be turned into fertiliser for farming and indeed the consultation document also mentions that sustaining agriculture can help re-cycle waste and trap carbon, however, this aspect has not been further outlined nor analysed in the document. The Hong Kong Productivity Council has also been exploring a 'Food Waste Conversion System' and one of the targets is to produce organic fertiliser¹². This technology can definitely help improve the well-being of the entire society (e.g., reducing waste, creating new industrial opportunities and, thus, creation of new jobs), but the document mentions very little in this regard.

Leisure farms, on-farm domestic structures and building of New Territories Exempted Houses on agricultural lands

28. There are now many farms in Hong Kong operating under the label of 'leisure farm'. The consultation document has also mentioned that the AFCD would promote leisure farming.

¹²http://hkpc.org/index.php?option=com_content&view=article&id=327%3Afood-waste-conversion-system-turning-qtrashq-into-qtreasureq&catid=144%3Aenvironmental-management&Itemid=244&lang=en

While we do not strongly object to the basic concept of leisure farming, we recommend that the government should be very cautious about promoting this recreational concept as a pillar of a policy, or dovetailing it into the mainstream of primary production.

29. We have found that, based on our on-site observations, some of the leisure farms are not seriously engaged in cultivation; many land uses which are not directly related to farming have been observed (**Figure 4**). Some ‘farms’/ ‘farm enterprises’ are also promoting the use of farmlands as a ‘Real Estate investment product’; advertisements of some of these ‘farms for sale’ can even be seen on property agency websites (**Figure 5**, and also **Figures 6 and 7**). We do not consider that the packaging of farmlands as a real-estate product is a healthy economic development. Furthermore, the problem of building illegal structures on agricultural lands is still prevalent, and some of these are used primarily for residential purposes¹³. Although we understand that on-farm domestic structures are allowed to be built on farmlands, we strongly recommend that the authority, when formulating the new agricultural policy, review and strengthen guidelines and protocols related to leisure farms and the on-farm domestic structures. Our understanding is that, currently, there are no strict protocols to oversee these two elements. Recently in Taiwan, many farmlands have been converted into luxury housing developments labeled as ‘farmsteads’ (**Figure 8**)¹⁴. We are highly concerned that this type of housing development project would become popular, in view of the rocketing property prices and, generally, unaffordable home-ownership circumstances in Hong Kong.

30. Based on the consultation document, there are around 3,168 ha of land zoned as ‘Agriculture’ (AGR) in Hong Kong. However, based on our data, in the period from 2012 to 2014, about 60% of the planning applications for building New Territories Exempted Houses (Small Houses/ ‘Ding’ Houses) on AGR zone have been approved by the authorities, and it is not uncommon, nowadays, to see newly-built Small Houses sited just next to active farmlands in rural areas (**Figure 9**). Obviously, the existing land use zoning system (e.g., AGR zone) is not sufficiently robust to protect farmland. Indeed, the authorities thoroughly understand this issue. In discussions on assisting farming activities in the Frontier Closed Area, a HKSAR Government **Planning Department** report states: ‘Areas for agriculture should be demarcated as a form of permanent land use to support agriculture/ agri-tourism and/ or to protect rural landscapes. Land for agriculture needs to be zoned very specifically for this use to avoid competition from other higher return uses and to ensure appropriate anticipation of

¹³ <http://www.info.gov.hk/gia/general/201403/26/P201403260482.htm>

¹⁴ <http://www.appledaily.com.tw/realtimenews/article/new/20141119/509089/>

landowners on the future use of these agricultural lands. In the planning context, the designation of agricultural use on abandoned farmlands can also **ensure land use certainty, help to manage public expectations for development and prevent incompatible surrounding land uses.**¹⁵

Our recommendations

A more clearly defined goal for the new agriculture policy is needed

31. The goal of the agriculture policy should be set to, ‘encompassing proactive support to sustainable agriculture and maximising the contribution of the food system to the well-being of the present and future generations in Hong Kong’.

Conserving farmland is the top priority of the new policy

32. Conservation of existing farmland (both active and abandoned) for sustainable agriculture should be set as the top agenda item in the new agriculture policy to eliminate the chance of other factors eroding this most important and fundamental resource, which is so essential for agricultural development. For instance, a more specific and rigorous zoning for cultivation should be in place in the land use planning system, and should be implemented (e.g., through re-zoning); this can prevent incompatible land uses (e.g., Small House) further eating into and reducing the area of arable lands.

33. We also recommend that the authority revise and increase the size of the proposed Agri-Park, and modify the Agri-Park initiative into an instrument with which to mitigate for unavoidable loss of agricultural land due to other development initiatives. This Park does not need to be developed on a single piece of land; it can be divided into geographically separate entities of varying sizes and then be set-up in strategic locations to provide multiple benefits such as landscaped areas, acting as buffers, regulating micro-climate, providing green, open spaces and passive recreational places for nearby citizens, as well as protecting biodiversity, creating wildlife corridors, etc.

34. It is also essential to impose ‘sustainable’ criteria (e.g., those from EU/ CBD) to govern the management and development of Agri-Park – long-term conservation of agricultural resources; including soil, land, and ecosystem services – this can also help Hong Kong to fulfill its obligations under the CBD and to meet the Aichi Targets. Sustainable criteria must be central to the Agri-Park’s mission. Only appropriate technologies and practices that are

¹⁵ http://www.pland.gov.hk/pland_en/misc/FCA/files_072010/Final_Report/Appendix%20M.pdf

compatible to and make contributions towards the mission should be included within its land-holdings. The Agri-Park should support development of sustainable agriculture in Hong Kong by securing high-quality agricultural land for: sustainable agriculture and research; supporting organic resource recovery; education; training; and development of the sustainable agriculture sector. Priority of allocation should always favour small-holding farmers and social enterprises which provide services to the community; not commercial traders or operators of agri-technology businesses.

35. We understand that the proposal of setting up an Agri-Park is still at a preliminary stage. At this early point, we strongly recommend that there should be an independently operating management agency managing such an Agri-Park. This agency should be overseen by an advisory body made up of independent experts (e.g., from the social enterprise sector, organic farming practitioners, agricultural accreditation professionals), members of NGOs and members of the public.

36. Though agriculture as an industry is, currently, modest in scale, it can contribute to the economy, provide job opportunities, engender a spirit of community and, most importantly, contribute to the overall well-being of society. However, there are two major constraints hindering the further development of local agriculture. One is that private landowners currently have the choice to leave their farmland fallow, hanging on to ‘hope-value’ – that sometime in future the agricultural zoning would be dropped and there would be real estate development opportunities, with huge fortunes to be made. This results in escalating agricultural land prices, forcing farmland to lay ‘abandoned’. Apart from displacing farmers, it also makes agriculture an ‘unaffordable’ and ‘impossible’ occupation for new farmers. The other constraint is the difficulty in securing long-term land tenure at reasonable rates. Farming is long-term affair. It relies on long-term nourishment of the soil. Fruit trees take many years to become productive. Short rental periods stifle commitment to invest money and sweat in developing farms and diversifying production. Hence, we wish to state that rent in all the land clusters in the future Agri-Park(s), that is to be used for accommodating eligible or displaced farmers for farming purposes should be leased, on long-term leases, at nominal rates, and should NOT be determined nor adjusted annually with reference to any kind of *market rate*. This should be part of the raft of practical and substantial supportive measures for sustainable local agriculture in the new agricultural policy.

37. Last but not least, careful consideration should be given to ‘scaling-up’ the proportions of the parcels of land and the size of an ‘operating unit’ for a ‘sustainable farm’ in any Agri-Park.

The ‘unit size’ of a ‘vegetable farm’ within any Agri-Park should preferably be formulated in such a way as to become attractive and encourage new farmers to take up farming as a livelihood. New farmers should be both individuals or community-based institutions, e.g., social enterprises. While individual farmers may, in a practical sense, require ‘smaller’ plots of land (e.g., ranging from 5 to 20 dau), social enterprises which offer community services may require much larger parcels of farming land in order that these can be viably operated as a farm. Thus, the Agri-Parks should actively foster and cultivate the participation of social enterprises which as a vibrant community sector in Hong Kong can draw upon a large volume of under-utilised human resources that can become engaged in the business of sustainable farming. This would increase the efficacy of production which comes with the larger economies of scale and vertically integrated operations that are available within the existing structural frameworks and management systems of social enterprises in Hong Kong.

Sustainable Agriculture Development Fund (SADF)

38. SADF should focus on promoting ‘appropriate and sustainable agriculture’ to ensure public money is being spent properly to maximise social benefits, not simply agri-business using modern technologies.

39. The newly introduced SADF should focus on sustainable agricultural initiatives that yield multi-fold social benefits, and that promote and facilitate: adoption of sustainable farming practices; organic resource recovery operations; engaging community enterprise in food processing for value-adding to local produce; fair-trade markets (such as farmers market, community farming and Community Supported Agriculture (CSA) system); food education programmes; sustainable agricultural research; and training and capacity building of existing and new farmers.

40. The SADF should support and promote appropriate technologies for sustainable agriculture, such as: traditional and sustainable culture and knowledge in line with the Biodiversity Strategic Action Plan (BSAP); bio-charcoal technologies; integrated pest control; composting; aquaponics; no-tillage farming; organic farming; permaculture design; agroforestry; roof-top and balcony farming; edible landscaping; and, community and school-based farms.

41. We need new blood to sustain the development of agriculture in Hong Kong. The existing training programmes offered by AFCD are fragmented, restricted to existing farmers (mostly elderly farmers) and technology-based; agriculture is currently absent from the syllabus of all

levels of Hong Kong's formal education – SADF should help fill this gap. SADF should support local institutions and qualified organisations to provide systematic learning and internship opportunities about sustainable agriculture for interested persons, especially young people, to join the agriculture sector.

Re-branding local agriculture to empower farmers

42. To upgrade agriculture in Hong Kong, we need to re-brand local agriculture with a new approach to focus on its multi-fold social benefits, not just on its products. It is very wrong for the consultation document to position agriculture as an industry that can provide job opportunities to lesser-skilled workers (7b, P.4). In order to achieve the benefits stated in the same paragraph of the document, to open up new employment opportunities for young people and others who aspire to develop a career in sustainable agriculture, we must, firstly, create a route for them to join the sector (i.e., places to farm, comprehensive courses to follow) and recognise and promote agriculture as a decent and honourable career, that is, skilled, life-fulfilling and contributes to a better society for Hong Kong. No one in Hong Kong can live without farmers – this is an important and key message in the area of food security education and environmental protection.

43. We strongly support the recommendation in the consultation document that weekend Farmers Markets can be held more frequently and in more districts. There should be a clearly stated target to set-up at least one regularly-operating weekend Farmers Market in each of the 18 districts of Hong Kong. There should be strong consideration given to utilising the numerous existing vacant premises dotted around Hong Kong such as the grounds of schools which have been shut down or government premises lying empty and unused such as the vacant abattoir at Cheung Sha Wan as designated community spaces and venues for such Farmers Markets in the urban areas. Indeed, Farmers Markets, CSA schemes and Community Farms are proven worldwide as effective platforms that tighten community bonding and facilitate mutual support between food producers and consumers. While consumers enjoy safe and fresh food from known, local farms, farmers also receive a fair return and respect. These relationships improve and sustain their livelihoods. Local and overseas cases also demonstrate that Farmers Markets and CSAs as being effective in encouraging wider public concern and support for local agriculture. Given that Hong Kong is a small place, where people could be easily connected, these platforms are far more important in building socially cohesive societies and networks than the conventional product-focusing marketing approaches that were mentioned as achieving the sustainable goals that are set out in the consultation document.

Doubling local food production in three years

44. We need a clear target to work towards if we are determined to advance agriculture for the benefit of the current and future generations in Hong Kong.

45. Given that the current quantity of fresh food production in Hong Kong is extremely low in comparison to our rich agricultural resource, it is practical and realistic to set doubling of the quantity of local production in 3-year time period as the mid-term quantitative target. Other practical indicators, such as organic resource recovery rate (especially food waste and horticultural waste), area of active farmland, quantity of organic produce, number of organic farms, community farms and urban farms, turn-over of local farmers market and average market-price of local produces, should also be used for monitoring the performance of the new agriculture policy in attaining multi-fold social benefits. Eventually, we consider that the Government should set-out a farm production self-sufficiency target.

46. Environmental auditing tools, such as carbon footprint and ecological footprint studies, should also be introduced to measure the significance of the environmental contribution made by local agriculture. Other initiatives to advance and assess the use of farming activities in life education, social integration, therapy, recreation, as well as food, culture and civic education should also be included in the policy.

Guidelines for leisure farm and on-farm domestic structures

47. We are highly concerned that the captioned will be subject to abuse and, eventually, arable land will be trashed by such developments. As mentioned, we recommend that new guidelines should be set-up to control and regulate these items, in order to ensure that they would not serve as a stepping stone for more aggressive or creative marketing of real estate developments, e.g., permanent residential housings labeled as homesteads or farmsteads.

Thank you for your attention.

Regards,



Andrew Brown

Executive Director

Kadoorie Farm and Botanic Garden



嘉道理農場暨植物園公司
Kadoorie Farm & Botanic Garden Corporation

cc.

Food and Health Bureau

Environment Bureau

Development Bureau

Planning Department

Lands Department

Conservancy Association

Designing Hong Kong

WWF – Hong Kong

Figure 1. An active, small-scale farm in the New Territories



Figure 2. Traditional farming in the New Territories



香港新界大埔林錦公路
Lam Kam Road, Tai Po, New Territories, Hong Kong
Email: eap@kfbg.org

Figure 3. An old farmer sitting next to an active plot of farmland which is surrounding by fenced-off, non-arable concrete-paved areas; some land lots in this area are occupied by Small Houses



Figure 4. Land uses not directly related to farming found in a ‘leisure farm’



香港新界大埔林錦公路
Lam Kam Road, Tai Po, New Territories, Hong Kong
Email: eap@kfbg.org

Figure 4. (con't)



Figure 5. Advertisement of a farmland shown in a property website



香港屋網 ENG 中文 簡體 海外房產

2015年02月: 平均成交呎價 \$8736 ↑0.76% (上月:\$8670)

地產主頁 買樓 租屋 新盤 成交 二手傢俬 家居 討論 置業工具 地產新聞 幫助中心 登入 會員登記

地產主頁 - 買樓 - 新界 - 元朗, 天水圍 - 農地

元朗 農地出售 - [redacted] 農莊 獨立水電 屋苑式設計 樓盤-賣草園 | 樓盤-豪華花園

樓盤資料	
樓盤編號	[redacted]
樓盤狀態	待售
叫價	\$133 萬
呎價(建築)	\$949
建築面積(呎)	1396
實用面積(呎)	此樓盤沒有有關實用面積資料。
物業地址	--
瀏覽人次	2307
收藏人次	1
刊登或續期日	2 月前
記錄更新	2 月前
放盤人最後登入日期	1 日前
放盤到期日	2015 [redacted]

投訴該樓盤 修改內容 儲存樓盤 電郵朋友 代辦物業查冊 打印

Figure 6. Advertisement on bill-boards shown on-site



香港新界大埔林錦公路
Lam Kam Road, Tai Po, New Territories, Hong Kong
Email: eap@kfbg.org

Figure 7. The so-called ‘farm’, seems to be ‘under construction’



Figure 8. A 'Farmstead' development in Taiwan

(source: <http://www.appledaily.com.tw/realtimenews/article/new/20141119/509089/>)



Figure 9. Newly-built luxury Small House next to a piece of active farmland



District Lands Office, North
Lands Department
6/F., North District Government Offices,
3 Pik Fung Road, Fanling, N.T.
(Email: lensd1@landsd.gov.hk)

12th July, 2018.

By email only

Dear Sir/ Madam,

Lands Resumption Ordinance (Chapter 124)
Resumption of Land for
The Establishment of an Agricultural Park in Kwu Tung South (Phase 1)

1. We refer to your letter dated 29th June, 2018 (your ref.: (19) in L/M (4) in DLON 501/NRN/59 (9)).
2. Our comments regarding the proposed two-lane road have been set-out in our previous submission to The Secretary for Transport and Housing (please see **Appendix 1**). While we have no objection to the lands resumption to be carried out for the Agricultural Park (Phase 1) (not including the part relating to the proposed road), we are highly disappointed to note in your letter that the proposed road as stated is ‘*a road of no physical central barrier dividing the directions of travel and with one lane per direction of traffic flow*’, which simply is a two-lane carriageway; this is NOT what the consultant’s report has proposed (i.e., a single lane two-way carriageway).
3. We can find the following definitions for different terms relating to carriageway/ road from the ‘Glossary of Terms Commonly Used in Government Departments’ under the Civil Service Bureau¹.

Single two-lane carriageway	雙線不分隔車路
Two lane single carriageway	雙線不分隔車道
Single lane road	單線道路
Single two way road	單線雙程道路

¹ https://www.csb.gov.hk/hkgcsb/glossary/glossary_en.php

4. Therefore, if the original proposal by the consultant as shown in the report refers to ‘*a road of no physical central barrier dividing the directions of travel and with one lane per direction of traffic flow*’, it should simply be termed as a single two-lane carriageway or a two lane single carriageway based on the definitions as shown in the table above. However, the original term used in the report is ‘**single lane two-way carriageway**’. Our understanding, based on the definition as shown in the Government’s website, is that it should be a ‘單線雙程車道’, and this is just the setting of the existing Tsiu Keng Road (please note that the proposed road is just an extension of Tsiu Keng Road).
5. We, thus, cannot fathom the description used in your letter, as what is mentioned clearly does not even tally with the common terms used by Government.
6. To conclude, we do not agree with the proposed road works and we maintain our strong objection against this road. Please refer to **Appendix 1** for our detailed views and our proposal.
7. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

- cc. The Hon. CHU Hoi Dick
The Secretary for Transport and Housing
Director of Lands
AFCD
CEDD
Designing Hong Kong
The Conservancy Association
Tsiu Keng and Cheung Lek Concern Group



嘉道理農場暨植物園公司
Kadoorie Farm & Botanic Garden Corporation

Secretary for Transport and Housing,
Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong.
(Email: gazettethb@thb.gov.hk)

22nd December, 2017.

By email only

Dear Sir/ Madam,

Road Works –
PWP Item No. 7471RO The Establishment of
an Agricultural Park in Kwu Tung South (Phase 1)

Executive Summary

While Kadoorie Farm and Botanic Garden (KFBG) welcomes the initiative of the Government to establish an Agricultural Park (Agri-Park) under the Agricultural Policy¹ and we hope that the Agri-Park can be established as soon as possible, however, we regret to inform you that we strongly object to the captioned road works based on the following grounds:

- a. The scale of the proposed new road is excessive (more than 16% of the potential arable lands within the Agri-Park (Phase 1) would be affected). A new two-lane road is not required in such an agricultural/ countryside setting.
- b. The proposed new two-lane road cannot be justified by the findings/ suggestion of the feasibility study commissioned under the Agri-Park project.
- c. The impacts of the proposed new two-lane road upon the environment and agricultural land have not been properly or adequately addressed in the feasibility study.
- d. There are many practical options to enhance the transportation network of the site

¹ https://www.policyaddress.gov.hk/2017/eng/policy_ch03.html

(e.g., upgrading the existing and underused branch roads) but these options have not been fully explored in the feasibility study.

- e. The Authority has the full responsibility to assure farming resources within the Agri-Park is well-preserved to meet its purpose. For essential works, all options (including the option with no additional main road but upgrading existing branch roads) must be fully examined and the option with the least impacts should be selected for implementation in this environmentally-sensitive and valuable agricultural landscape.
- f. **A brand-new main road is simply unnecessary.** Even IF, unavoidably, a road is to be built, **a single-lane road is sufficient to serve the need.**

Road Works –
PWP Item No. 7471RO The Establishment of
an Agricultural Park in Kwu Tung South (Phase 1)

1. With regard to the captioned subject, our detailed views and comments are as follows.
2. We have met with the Civil Engineering and Development Department (CEDD), and, the Agriculture, Fisheries and Conservation Department (AFCD) more than once to voice out our strong concerns about the proposed new two-lane road. Regrettably, we do not feel that our concerns have been adequately addressed nor we have been convinced by what we have heard from the project staff.
3. In mid-December 2017, we received a ‘masked’ feasibility study (a final report dated February 2017; herein after called ‘the report’) regarding the infrastructure of the Agricultural Park (Agri-Park) (although our request for the report was originally made in August 2017). We found that, however, the suggestions/ findings of this report have even further strengthened and reinforced our view that the proposed new two-lane road is NOT needed nor is an essential component of the Agri-Park. Therefore, based upon our on-site observations, the contents of the report and the website of the Transport and Housing Bureau², we can only conclude that we have to register a strong ‘objection’, after consideration of the actual and potential impacts of the proposed new two-lane road on the locality.
4. Simply speaking, the prime intention of the Agri-Park should be to support, promote and conserve local agricultural resources in all its myriad forms. Thus, we consider that to enable such purposes **ALL** existing arable land (environmental resources, i.e., land security, soil integrity and fertility, and, water security) and farmers (human capital and livelihoods) should be protected as far as possible. This has been mentioned, repeatedly, during our meetings with the relevant authorities. **This is about integrated protection of both the tangible and intangible agricultural resources in our countryside, not just a typical provision of a rural infrastructure works project.**
5. Unfortunately, the proposed two-lane road will have **direct impacts** upon the tangible and intangible agricultural resources in our countryside. The magnitude of the proposed new road

² <http://www.thb.gov.hk/eng/psp/publications/transport/gazette/gazette.htm>

is of excessive scale, and, we cannot see any strong or valid justification to support the necessity of such a scale of roadworks (i.e., two-lane). In contrast, the existing facts and findings (e.g., from the report) all point to the conclusion that this proposed two-lane road is NOT required. Moreover, it would also completely destroy much arable land long before any tangible benefits can be realised (未見其利，先見其害) i.e., many agricultural land parcels presently under **active cultivation** are directly within the proposed new two-lane road footprint and, thus, will be directly, permanently and irreversibly destroyed. Hence, we consider that the provision of the new two-lane road is **absolutely contradictory** to the original intentions of setting-up the Agri-Park. We are also highly concerned about the potential widening proposal for the Tsiu Keng Road as stated in the report. Our rationale for objection to this new two-lane road is elaborated upon in detail in the following paragraphs.

The scale of the proposed road is excessive

6. The size of the Agri-Park (Phase 1) is only about 11 hectares³. However, the private land area to be resumed (including some of the existing active farmlands) for the construction of the proposed new two-lane road is already about 1.76 hectares⁴ (i.e., not including the area of Government Land under the road footprint). The construction of this road would thus affect more than 16% of the area of the Agri-Park (Phase 1), i.e., only 8 out of 11 hectares of land inside this Phase 1 would be left to be used for farming³; thus, a relatively large portion of the remaining area would be taken up by the proposed new two-lane road.

7. There is already an **existing concrete-paved standard vehicle road** serving the Tsiu Keng area just to the south of the proposed new road (i.e., the Tsiu Keng Road) (**Figure 1**). As shown, it is a single-lane road with many lay-bys and it has already served the locality for years. Based on our on-site observations, this road is largely under utilised (**Figure 1**) and this observation is supported and reinforced by the findings of the traffic assessment in the report (see below). In addition, although the proposed new road is a two-lane system, however, it eventually needs to be connected-up with the **existing single-lane Tsiu Keng Road** at the eastern end, as shown in the gazette². In reality, that means all vehicles moving in and out of this proposed new two-lane road still has to utilise the single-lane Tsiu Keng Road (if it is not to be widened) before accessing the Fan Kam Road. We simply cannot understand this logic – although the new road proposed to be built is a two-lane system, vehicles accessing the

³ www.districtcouncils.gov.hk/north/doc/2016_2019/tc/dc.../n_2017_048_ch.pdf

⁴ http://www.thb.gov.hk/tc/psp/publications/transport/gazette/7471RO_Resumption%20Plan_DNM3526.pdf

Agri-Park still need to move onto and use a narrower single-lane road, and, a bottle neck will be created between this new road and the Fan Kam Road.

8. As a reminder, the main vehicular route serving the entire area from Pat Heung to Kwu Tung South – the Fan Kam Road – is only a two-lane road. If the proposed new road is only to serve the Agri-Park (which is only a portion of the entire area) and the future and foreseeable land-use status would not be much changed, i.e., still the same for genuine commercial farming; then, why is an additional new two-lane road which would only be **a branch of the Tsiu Keng Road (single-lane)** and **a secondary branch of the Fan Kam Road (two-lane)** necessary?

9. The Tsiu Keng area has been under very extensive, active, commercial-scale cultivation and agricultural production for decades but the standard road (i.e., the existing single-lane Tsiu Keng Road) connecting the area with the Fan Kam Road was built only around 2007 (as revealed by the aerial photographs from the Lands Department). If the commercial farms in the area have been operating well in the past decades without a two-lane road (or even without the existing single-lane Tsiu Keng Road which was only built around 2007); why is there suddenly a need for an additional new two-lane road **when** the future land use proposal (i.e., the Agri-Park) is to only resume the original agricultural status (i.e., much farmland that has been abandoned in recent years would be restored after the establishment of the Agri-Park)? **If a two-lane road is ‘vital’ in supporting genuine commercial farming, how could the commercial farms within the Tsiu Keng area survive for several decades in the past (i.e., well before 2007)?** While we agree that more facilities for future farmers/ users should be provided, we cannot see that this can be used to justify the necessity of the proposed new two-lane road especially when a variety of other options (e.g., up-grading existing van tracks/ branch roads/ footpaths extending from the existing Tsiu Keng Road) are actually present and available but, unfortunately, have not been fully explored and compared with the present proposal.

The proposed two-lane road cannot be justified by the findings/ suggestion of the report

10. As stated above, we received a ‘masked’ report (dated February 2017) about two weeks ago. In the remaining (‘unmasked’) text of the report, we note the following:

Section 3.7.4 at pages 12 and 13:

*...**The proposed main road will be** designed to a public road standard for a **single lane** 2-way carriageway...to serve the tenants of the park as well as the*

local villagers/ residents.

Section 4.2.7 at page 20:

...Considering there is limited village traffic along Tsiu Keng Road, the development (i.e., Agri-Park) will have minimal impact to the existing single carriageway with passing bays...

11. From the above, we can note the following facts/ findings:

- The original proposal, according to the unmasked text of the report, is to build a single-lane road to serve as the main access for future Agri-Park users.
- Existing traffic on the single-lane Tsiu Keng Road is limited; this is consistent with our observations as stated in paragraph 7 and shown in **Figure 1** of this letter.
- The development of the Agri-Park will not (and indeed it should not (in order to preserve the rural setting)), in any way, significantly increase the traffic burden of the existing single-lane road (i.e., Tsiu Keng Road).

12. Thus, with a view to saving tax-payers' money and unnecessary expense, reducing carbon emissions (e.g., during the construction of the new road) **and reducing the permanent loss of arable land** (i.e., under the proposed two-lane road footprint); **why is it NOT possible to simply continue with the use of the existing and under-utilised Tsiu Keng Road as the main access route for the future Agri-Park?**

13. We agree with the report that there should be branch roads/ van tracks/ footpaths extending/ leading off from the main access route to various parts of the Agri-Park. However, we cannot see the need to build a brand-new two-lane road to serve as this main access; the existing Tsiu Keng Road can already serve this purpose especially in view of the fact that it is actually under-used. Even IF a new main access has to be 'unavoidably' built (e.g., maybe to avoid 'village environs'), it does not need to be a two-lane road. Indeed, the report for the Agri-Park suggests a single-lane road only (as the new main access) as stated above.

Potential secondary impacts caused by the proposed two-lane road

14. Other than the facts as stated above, the report reveals that a section of Tsiu Keng Road is proposed to be ‘upgraded’ because there is a ‘need’ to improve the transportation of the area. We find this to be a highly confusing statement.

15. As mentioned in the report, itself, the traffic on the existing Tsiu Keng Road is largely limited and the provision of the Agri-Park would not involve any significant traffic impacts. Then, why is it being proposed that the Tsiu Keng Road needs to be ‘upgraded’? We consider that there can be more passing bays and more turnaround facilities provided on this road (e.g., for the future Agri-Park users) but if the ‘upgrading’ is to widen the Tsiu Keng Road (e.g., as revealed from the title of Figure 4.2 of the report), we simply consider this is a waste of taxpayers’ money.

16. Indeed, the widening of the existing Tsiu Keng Road and/ or provision of a new road (i.e., the proposed two-lane road) simply means a reduction in the area of potential arable land. We agree that, as mentioned above, transportation for the agricultural area of Tsiu Keng (i.e., the future Agri-Park) could be enhanced but the works should not be excessive (i.e., over-engineering). Improvement to the transportation networks can be easily accomplished by simply upgrading the existing van tracks or footpaths which are already serving the extensive mosaic of active farmlands (**Figure 2**). By doing this, environmental damage and disturbance to the surroundings can also be minimised. In fact, such a similar view has been briefly mentioned in the report (Section 3.7.5). IF the need to widen Tsiu Keng Road is now being driven by the proposed construction of the captioned new two-lane road, we consider this is a putting-the-cart-before-the-horse scenario. In view of the established fact that the existing Tsiu Keng Road is under-utilised, thus, it is clear that it is NOT necessary to build the proposed new two-lane road.

Environmental and agricultural impacts of the proposed new two-lane road not adequately addressed

17. Farmland provides important habitats for birds and herpetofauna. Watercourses in the area also provides habitats for many wetland birds and aquatic wildlife. Although the proposed new two-lane road would have direct, permanent and irreversible impacts on farmlands and watercourses, the environmental impacts on these habitats have not been adequately addressed or even mentioned in the report. We would like to know what environmental considerations have been taken into account during the decision-making process for the present proposal? Is

the present alignment the best and minimal impact option from environmental, agricultural landscape and watershed perspectives? What are the mitigation measures and actions for the permanent loss of the arable farmlands along the route of the proposed new road?

18. There was a planning application for an international school (A/NE-KTS/390) within the locality (recently withdrawn) and there was a proposed road associated with that application. The alignment of the road and its route in that planning application is similar to the captioned new two-lane road. We know that, during the planning application process, the Conservation Authority was highly concerned about the impact of the proposed road on the watercourses and had required the applicant to address such concerns. Similarly, we hope that the proposed new two-lane road for the Agri-Park would have gone through a similar process of rigorous vetting (e.g., what were the environmental considerations involved?). Unfortunately, we are unable to discern that such environmental considerations have been addressed in the report.

19. As aforementioned, the present alignment would have direct, permanent and irreversible impacts on existing active farmland. If the proposed road can be reduced in scale (e.g., from two-lane to single-lane), we believe that the loss of arable land (and associated environmental impacts) can be reduced in magnitude. Unfortunately, we cannot see that the proposed new two-lane road is a product of serious and holistic consideration from both environmental and agricultural perspectives (i.e., minimising environmental and agricultural impacts). Neither has various alignment options for comparison been included in the report.

20. We **strongly urge** that the Authority propose several options for access, e.g., two-lane, single-lane, no new road but upgrading existing tracks, and compare their impacts on arable land as well as the environment. The option with the least impacts should be the guiding principle for any such proposal.

Conclusion

21. We urge the Authority to understand the difference between '*demand*' and '*need*'. Based on our understanding, some communities were consulted for the establishment of Agri-Park (including the proposed new two-lane road). However, we would like to ask how many of these people and communities are actually doing farming on a day-to-day basis and are dependent upon farming as a means of livelihood? How many of them are genuine famers? In contrast, from our interactions and engagement with some members of the farming community, our understanding is that they are highly concerned about the scale of the engineering works

within the Agri-Park. Many of them are concerned that there would be over-engineering. If the present proposal is mainly to cater for the '*demand*' of some non-farming communities but not the genuine '*needs*' of real farmers, we simply consider the consultation process to have failed to identify and address these needs of genuine farmers. The Agri-Park is mainly for genuine commercial farming; it is not intended nor designed for recreational farming, residential use, industrial use or brown-field commercial operations.

22. To conclude, our views are as follows:

- The proposed two-lane road is neither essential nor needed for access to the Agri-Park. Thus, we strongly object to the new road works proposal.
- There are many options available to enhance the transportation network of the site such as improving existing van tracks/ footpaths which are already serving the area for years; small-scale branch roads extending/ leading off from the existing Tsiu Keng Road which is now under-utilised can be upgraded.
- A brand-new main road is not necessary. Even IF it is unavoidably to be built (e.g., maybe there is a need to avoid the village environs), it does not need to be a two-lane road.
- The proposed road alignment will directly, permanently and irreversibly impact on existing active farmlands and some watercourses. We strongly urge that there should be considerations of more options (including the option where there is no additional main road but just involves upgrading existing branch roads) for comparison purposes and the option with the least impacts should be chosen for implementation.

23. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

cc. FEHB, CEDD, AFCD, Relevant NGOs

Figure 1. The existing situation of Tsiu Keng Road (photographs taken in December 2017).



Figure 1. Cont'd.

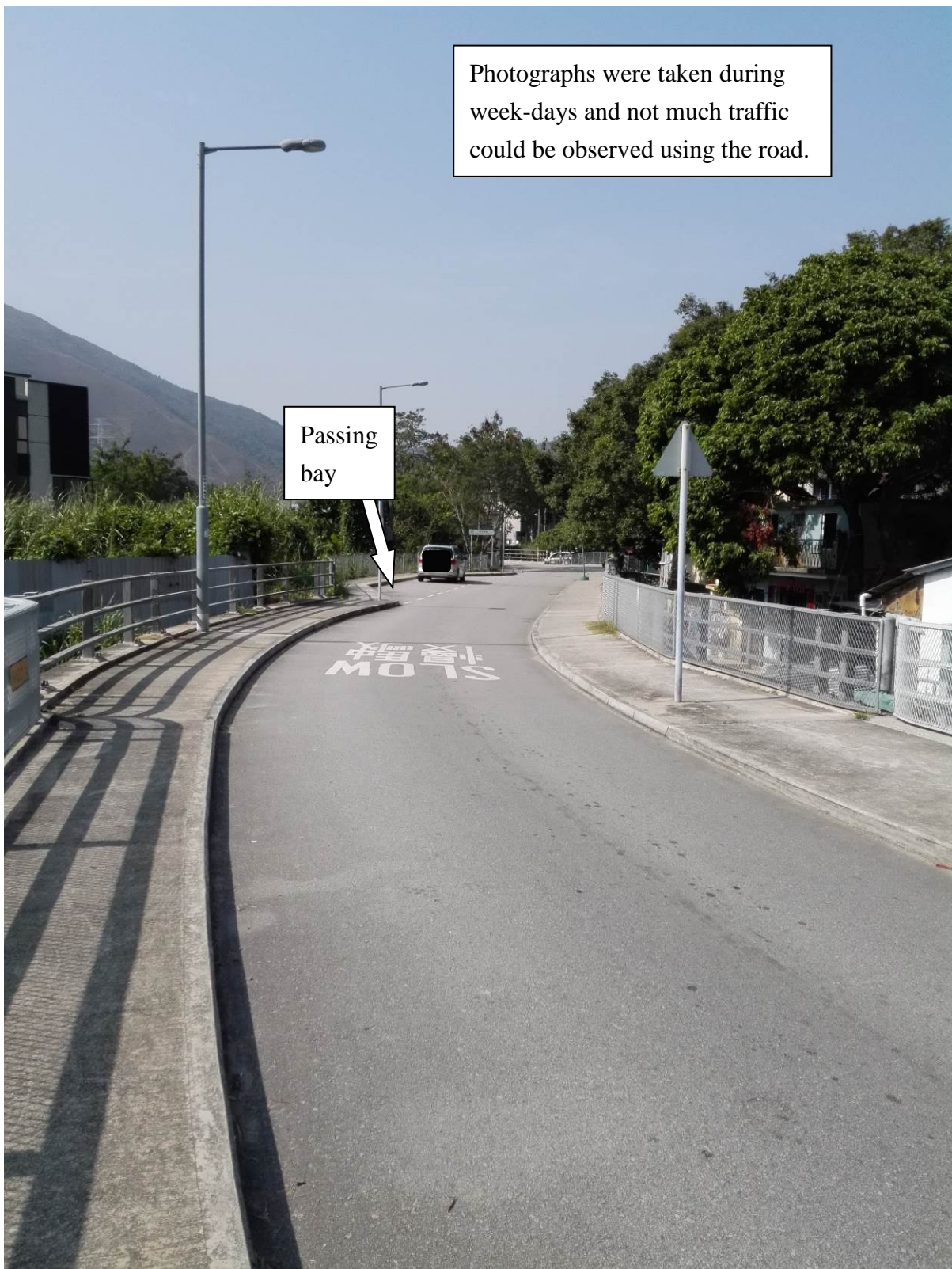


Figure 2. Some van tracks/ footpaths leading off/ extending from the Tsiu Keng Road.



Figure 2. Cont'd.



Figure 2. Cont'd.

