



世界自然基金會
香港分會

WWF-Hong Kong

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致立法會衛生事務委員會中醫藥發展事宜小組委員會主席及委員

各位議員鈞鑒：

回應中醫藥發展事宜小組委員會

2020 年 2 月 24 日 (會議議程) 事項 I. 政府發展中醫政策工作的最新進展

就中醫發展事務委員會將於 2020 年 2 月 24 日討論上述議程，為了下一代的福祉，世界自然基金會香港分會 (WWF) 強調在中醫藥發展的同時，中藥材的保育和可持續性亦同樣重要。

中醫學是世上其中歷史最悠久的醫療系統之一，其貢獻之大在本地以至國際間享負盛名。但是，有些中藥材，如野生人參、穿山甲、老虎、犀牛、麝香鹿和賽加羚羊均遭到過度開採或獵殺，導致其數量大幅銳減。縱使部分野生生物貿易並非違法，但是持續的偷獵和非法貿易已經對許多具藥用價值的動植物構成嚴重威脅。

生物多樣性及生態系統服務政府間科學及政策平台 (Intergovernmental science-policy Platform on Biodiversity and Ecosystem Services, "IPBES") 早前提出，全球生物多樣性損失率已跌至史無前例的低點，地球上大約有一百萬物種正面臨絕種的危機，而過度開採或獵殺是其中一個最大的直接威脅。儘管如此，每年仍有上百萬用作中藥材的野生動植物被捕殺或採割，以應付中藥市場的龐大需求。大規模的獵殺、開採和非法貿易造成這些具藥用價值的動植物數量大幅下跌，甚至面臨滅絕。

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WWF 認為非法及一網打盡的野生動植物貿易是現時本港中醫藥發展的重大議題。政府應正視因中醫藥而衍生的非法野生動植物貿易的影響，制定預防性措施，保護這些具藥用價值的物種，維持牠們的數量以及在大自然中的重要生態角色。根據生物多樣性公約，香港有責任確保在其管轄或控制範圍內的活動不會對超出香港管轄範圍區域的環境造成破壞。對於政府以可持續發展的方式發展中醫藥，及遵守生物多樣性公約第三條的原則，WWF 提出以下建議：

1. 將野生物罪行列入《有組織及嚴重罪行條例》附表一

現時，香港仍被視作全球非法買賣野生物種的樞紐。在 2013 年至 2018 年間，根據相關報道香港共緝獲價值約 6.33 億港元的野生物製品，其中包括象牙、穿山甲鱗片和犀牛角，相當於屠殺了 3,200 頭大象，101,000 隻穿山甲和 62 頭犀牛。穿山甲鱗片、犀牛角、老虎骨、獅子骨、海馬和賽加羚羊角等也是常見的中醫藥材。根據世界自然保護聯盟 (IUCN) 的報告，中國中藥市場的需求導致了穿山甲和穿山甲鱗片的巨額販運。隨著「一帶一路」和「大灣區」計劃的進一步發展，香港作為轉運及貿易樞紐亦決定了香港可以成為制止非法野生物販運的領導者角色。WWF 促請政府立即將第 586 章《保護瀕危動植物物種條例》的相關罪行 (例如第 5-9 條和第 11-15 條) 列入第 455 章《有組織及嚴重罪行條例》(OSCO) 附表一，以進一步遏止非法野生物貿易。非法野生物貿易常與有組織國際犯罪集團有關，通過將非法野生物貿易犯罪列入 OSCO 能更有效地打擊相關罪行，否則可能使香港遭到國際譴責甚至被邊緣化。尤其現時已經證實人畜共通傳染病與野生動物買賣有關，有學者估計傳染病爆發將對全球經濟和社會帶來高達數以十億元計的損失。

2. 加強中藥材的藥物標籤和增加藥物處方的透明度

東亞野生物貿易研究委員會 (TRAFFIC) 的調查指出，公眾多數支持以可持續發展的方式，從大自然中獲取中藥材，同時反對使用瀕危的動植物作中醫藥用途。有見及此，WWF 建議中藥業小組委員會研發一套標籤系統來識別中藥材的學名、原產地、生產方法，以及在 IUCN 瀕危物種紅色名錄中該物種的受威脅級別等資訊供市場使用。病人亦應有權選擇由可持續物種生產或製成的中藥材。中醫師應告知病人該中藥材中是否含有受威脅物種，並提供可持續的替代藥品，取得病人的同意後才可以處方藥物。中醫師亦應避免使用、建議病人使用或處方任何由受威脅的動植物中提取的中藥材及其副產品。

3. 向公眾和中醫藥從業員提倡可持續發展中藥

政府已計劃投資 5 億元促進中醫藥發展。WWF 強烈建議將「可持續性」的概念、針對野生物種影響的預防性措施以及「責任中藥採購」的最佳做法納入中醫藥發展基金 (CMDF) 旗下行業支持計劃的教育項目中。同時，中醫中藥發展委員會應開展有關受威脅物種替代藥品的科學研究。CMDF 還可以建立開放式、數碼化平台，為大眾提供使用可持續藥品的中醫從業員名單、其診所位置，以及中藥背景資料，例如可入藥的野生物種在 IUCN 瀕危物種紅色名錄中的受威脅級別。為進一步減少在中醫藥中使用受威脅的物種，香港中醫藥管理委員會亦應與保險業監管局合作，任何列入第 586 章的物種 (包括附錄 I、II、III 物種) 均不應包括在醫療保險可報銷的範圍內。另外，中醫學生和從業員應重視 IUCN 瀕危物種紅色名錄，盡量使用非受威脅物種和具可持續性的藥材。

我們相信上述建議可以確保我們的後代繼續受惠於博大精深的中醫學，亦可以令受威脅的野生物種得以繁衍生息。讓香港令我們引以為傲，成為亞洲其中一個最具可持續性和宜居的城市。

敬祝
鈞安!



David Olson 博士
世界自然基金會香港分會保育總監 謹啟

附件: 世界自然基金會 2019 年施致報告建議書

副本抄送: 環境局局長黃錦星
食物及衛生局長陳肇始

二零二零年二月十八日

世界自然基金會香港分會
2019-2020 年《施政報告》建議





推動香港成為亞洲最可持續的城市

世界自然基金會香港分會 (WWF) 促請政府仔細審閱、進一步考慮，並採納本會去年就 2018-2019 年度《施政報告》提出的建議，該等政策倡議至今仍極為重要，應被納入考慮之列。WWF 現提出以下政策倡議，供行政長官在制訂 2019-2020 年《施政報告》時考慮及採用：

1. 擴大海洋保護區範圍對本港沿岸水域極為重要

本會繼續強調政府需設立及擴大海洋保護區的重要性，尤其在西大嶼山和南大嶼山水域，並於海洋保護區內設立並嚴格執行小規模的禁捕區。妥善規劃並管理有關水域定能對生物多樣性及漁業帶來莫大裨益。設立海洋保護區對沿岸水域恢復健康水質和提升修復力起關鍵性作用，因此本會亦期望政府能儘快於海下灣海岸公園設立真正的禁捕區。

政府需實行大型海洋空間規劃和流域管理，以發展及管理海洋保護區系統。穩健的海洋保護區系統有助香港政府履行其對《生物多樣性公約》的責任，並執行其在《生物多樣性策略及行動計劃》中有關保育中華白海豚及其他海洋生物的措施。本會促請政府積極執行以下措施：

- i. 在預算案撥出資源為海洋保護區擴展至 30% 香港水域進行可行性研究，確立具科學基礎的捕魚區、漁業管理區、以社區為本的漁業資源區，並指定其他位置作海洋保護區；
- ii. 劃定海洋保護區內擴大禁捕區的網絡，有效規劃及管理海洋保護區對生物多樣性有莫大裨益，並有利漁業發展。

今年可能是香港拯救中華白海豚的最後機會

應對本港中華白海豚數目持續下降，把西大嶼山和南大嶼山水域劃為海豚保育管理區已迫在眉睫，並於區內數個近岸主要海豚棲息地嚴格限制船速和海上交通。在大嶼山設立海豚保育管理區有助達致於 2030 年前將 30% 香港水域劃為海洋保護區的目標，並透過建立具科學根據的

海洋保護網絡，包括禁捕區、漁業管理區和以社區為本的漁業資源區，建立能有效管理及以科學為本的海洋保護區。

自 2015 年起，中華白海豚開始由原來的棲息地南遷，這改變極可能與多個在北大嶼山和東北大嶼山沿岸進行的工程項目所產生的干擾有關，大嶼山南部海域的棲息環境險峻，不單受船隻噪音污染，海豚亦有機會被船隻撞倒。此外本會去年進行了聲音傳遞模擬研究，針對即將於索罟群島東南面施工的液化天然氣接收站打樁工程發出的噪音進行研究，結果發現噪音嚴重影響於該水域一帶棲息的中華白海豚，受影響範圍包括擬議中的南大嶼山海岸公園，令已大幅減少的海豚數目進一步受威脅。根據漁農自然護理處之監察以及本會的海底聲音研究，現有及擬定中的海岸公園未能覆蓋海豚的主要棲息地。為興建機場第三條跑道，政府推行紓緩措施設定現有及擬定的海岸公園，然而卻未能切合保育海豚的需要。建築項目開始後，海豚甚少在現有和擬議中的海岸公園範圍內棲息，亦沒有跡象顯示它們將來會重返區內。為了穩定和恢復僅餘的香港海豚種群，我們促請政府採取迫切措施：

- i. 擴大和連接現有的海岸公園，為海豚建立以科學為基礎運作、連接緊密及管理完善的重要棲息地網絡，供其覓食、社交和休息。在 2020 年前，於西大嶼山和南大嶼山水域設立海豚保育管理區，並嚴格規管在指定範圍內的水上交通、航道及航速；
- ii. 成立一個以社區為本的工作小組，小組由相關政府部門、學者、環保團體、地區團體、觀豚營運商、漁民和村代表組成，為海豚保育管理區攜手合作；
- iii. 要求發展項目在將來的環境影響評估報告中，加入評估建築工程對當地中華白海豚造成的影響，尤其由打樁產生的噪音。

本會重申政府應避免進行任何填海工程，以免破壞重要的海岸生境。海岸生境是中華白海豚、江豚以及眾多海洋生物的重要棲息地，把沙石投下大海並不是人類保護大自然的行為。

2. 將非法野生生物貿易列為「嚴重罪行」履行香港在國際上的責任

香港現時被視作全球非法買賣野生生物種的樞紐，嚴重影響本港的國際形象。本會促請政府將非法野生生物貿易及其有關罪行列入《有組織及嚴重罪行條例》(OSCO)附表一，以進一步遏止跨國犯罪集團利用香港作走私和非法野生生物貿易的主要港口。本會亦強烈促請政府遵照財務行動特別組織(FATF)的第30項建議，把非法野生生物貿易視為與洗黑錢有關的上游罪行，並利用打擊洗黑錢工具協助進行檢控。

在 2013 年至 2017 年期間，香港共檢獲市值五億六千萬港元的野生物種製品，當中包括非法象牙、穿山甲鱗片及犀牛角，相等於獵殺了共 3,000 頭大象、65,000 隻穿山甲及 51 頭犀牛。在 2019 年 1 月，單是在一個來自尼日利亞的裝運貨櫃就檢獲了 1,000 根象牙和 8 噸穿山甲鱗片。根據最新報告顯示，由 2013 年至 2017 年的 379 次截獲中，大部分屬於裝運貨櫃，分別來自最少 45 個國家，當中約 70% 來自東非，但最終只有 1% 的案件被成功起訴。

買賣非洲象牙及穿山甲屬於聯合國毒品和犯罪問題辦公室 (UNDOC) 和香港特區政府列明的有組織罪行，此類大批量及高價值的買賣抵達香港或亞洲其他港口時，絕對屬於有組織犯罪網絡的嚴重罪行。把非法野生物貿易及其有關罪行視為嚴重罪行不但可增加成功起訴的機會，更有助調查洗黑錢活動。根據 FATF 和《瀕危野生動植物種國際貿易公約》(CITES) 的建議，打擊洗黑錢工具可用於檢控非法野生物貿易及其有關罪行。此舉符合 FATF 的第 30 項建議，亦有助執行 3 項打擊相關罪行的行動，包括：搜集更多證據支持起訴上游罪案；緝拿其他涉及更大規模犯罪集團的罪犯；助準確估計罪行帶來的收益，以便成功遏止罪行並充公其所得收益。

香港奉行自由貿易政策，並堅定支持多邊貿易制度。將非法野生物貿易及其有關罪行列入 OSCO 附表一能確保香港履行亞太經合組織 (APEC) 有關非法野生物貿易協議的承諾，加強打擊非法野生物貿易亦讓香港遵守 APEC 協議，包括第 26 屆亞太經合組織部長級會議，以及 2015 亞太經合組織領導人宣言中，承諾遏止非法野生物貿易及相關貪污行為。本會促請政府：

- i. 將非法野生物貿易及其有關罪行列入 OSCO 附表一，以進一步遏止跨國犯罪集團利用香港走私野生物種。執法機構亦可採取全面措施，從源頭到買家、販運人士到集團首腦整個犯罪集團一網打盡，而不是只集中調查對犯罪集團影響較小的走私犯；
- ii. 透過香港警察刑事及保安處和聯絡事務科聯手，加強與野生物種製品來源國溝通，收集非法買賣野生物種的跨國集團情報；
- iii. 加強香港政府的跨部門野生動植物罪行專責小組的工作，並與國家瀕危野生動植物種國際貿易公約執法協調機構 (中國) (NICECG)、打擊野生動物犯罪國際聯盟 (ICCWC) 以及其他地區野生動物執法網絡之間的緊密合作，進行情報分析和資源分配，協助偵查非法購買、出口或再出口的野生物種產品，並採取執法行動。

非洲大象、犀牛、老虎、眾多海洋物種和其他數千物種的生命危在旦夕，當中很多因香港進出口買賣而面對生存威脅。這些物種或在未來數年間絕種，救援工作刻不容緩。

3. 訂立明確和受監管的減碳目標 將全球升溫幅度控制於攝氏 1.5°C 內

世界各國政府必須解決氣候危機，以一貫方式應對氣候變化已不可行。聯合國轄下的政府間氣候變化專門委員會 (IPCC) 在《全球升溫攝氏 1.5 度特別報告》中提到，各國必須立即採取有效行動，對付全球氣候危機和全球暖化。應對氣候危機需要所有持份者積極參與，尤其政府必須制定措施、法律和規例，尋求徹底改變，不能再墨守成規。

香港的減碳行動有賴政府不斷支持，因此 WWF 促請政府推出減碳融資計劃，將早前能有效在政府樓宇提升能源效益和鼓勵使用可再生能源的措施，應用到所有公共空間、政府基建如高速公路隔音屏障及私人建築物。我們亦強烈建議政府於 2050 年前制定 50% 的能源節約改善目標，並在所有新落成和現有建築物強制實施減緩措施和適應氣候變化的樓宇建築計劃。與此同時，政府應在 2030 年前把本港可再生能源發電比例訂為 10%，並在本地社區試行低碳鄉村先導計劃，亦可在本港現存的草坪範圍推行大型本地物種植林計劃，以發揮碳封存作用，令香港變得更加為碳中和。

為了使香港可再生能源發電比例在 2030 年前達到 10%，政府可在政府及社區建築物、公共空間、建築物的垂直外牆及高速公路隔音屏障等具有大面積平面的範圍，安裝太陽能光伏系統，在各方面增加應用太陽能光伏科技，擴大現時使用的範圍。此外，政府應充分利用現有的可再生能源創新科技，特別是垂直太陽能電池板和大廈幕牆，在香港獨有的摩天大樓城市設計採用及發展太陽能。就長遠減碳策略而言，提高建築物能源效益是減少香港整體電力消耗的關鍵範疇。政府應強制推行綠色建築，並加入針對氣候變化的元素。香港政府的公營機構可提供融資，為本地及區內提供減碳的經濟誘因。WWF 建議政府採取以下行動：

- i. 由行政長官領導所有政府部門和公共機構，制定及承諾執行以科學根據為基礎的減碳目標，將全球升溫控制於攝氏 1.5°C 內；
- ii. 訂立政策框架，考慮所有方案包括具法律約束力的碳預算，以將全球升溫控制在 1.5°C 內，並在 2050 年前實現 50% 的節能目標。
- iii. 制定中央採購政策，以將全球升溫控制在 1.5°C 內的目標；
- iv. 推出減碳融資計劃，將早前有效地將政府物業提升能源效益和鼓勵使用可再生能源的措施應用到公共空間、政府基建如高速公路隔音屏障及私人建築物；
- v. 強制所有新落成和現有建築物實施減緩措施和適應氣候變化的樓宇建築計劃；
- vi. 在 2030 年前把本港可再生能源發電比例訂為 10%，並在本地社區試行低碳鄉村先導計劃；

- vii. 在本港現有的草坪範圍推行大型及全面的本地物種植林計劃，以發揮碳封存作用，令香港變得更加碳中和。

4. 增加香港生產及銷售更符合可持續原則的天然資源及減低生態足印

近年，香港市民對可持續生活模式的意識日漸提高，成效漸見於魚翅、海鮮和紙製品等生物資源，以及非生物資源如塑膠等。然而，香港消費者在意識與付出行動兩者間仍有差距。香港的人均生態足印高踞亞太地區第 2 位，全球排名第 10。根據 2019 年發表的數據，若全球人類以港人的模式生活，將需要 4.2 個地球才可以支撐所需資源，遠超 2016 年的 3.9 個地球資源。部分物種亦因過度消費及買賣而被列為受威脅物種。

本會促請政府規管野生物種食物製品標籤，以提高此等食物來源地及生產過程的透明度，同時推廣以可持續方式生產的自然資源產品，並針對預先包裝海鮮食品的食物標籤推出先導計劃。政府可在全港實施回扣計劃，為商界及消費者提供經濟誘因採購可持續產品。

香港不僅是世界首屈一指的國際都會，更是全球消費品的貿易樞紐。鼓勵商界及消費者實踐可持續消費可紓緩香港對世界自然資源造成的負面影響，並帶動綠色經濟發展，推動香港成為亞洲最可持續發展城市。WWF 建議政府落實下列方案：

- i. 規管野生物種食物製品標籤，以增加產品的透明度，並針對處理預先包裝海鮮食品就食物標籤推出先導計劃；
- ii. 實施「回扣計劃」，鼓勵商界及消費者採購更多可持續產品，並獎勵零售商及消費者實踐可持續貿易及消費；
- iii. 在 2022 年前禁止使用所有即棄發泡膠餐具；
- iv. 政府於 2021 年完成《管制或禁制即棄塑膠餐具的可行性、範圍和機制研究》後，立即制定清晰時間表全面淘汰所有即棄塑膠餐具；
- v. 成立援助基金，助餐飲業向消費者提供經濟誘因，鼓勵自備食物容器及餐具；
- vi. 在西貢碼頭及中環碼頭實施廢棄塑膠回收服務先導計劃；
- vii. 引入生產者責任制，解決由超級市場及餐飲業產生的塑膠包裝及即棄塑膠餐具所帶來的問題。

5. 為未來守護重要生態熱點

現時，本港有約三分之一的土地不受任何法定土地使用規劃和管制所保護（見圖一）。當中，具生態價值的私人土地承受著不受規管的環境破壞行為、土地用途的改變和城市發展等壓力，令珍貴的本地生物多樣性岌岌可危。本會建議政府成立自然保育信托基金，以解決目前有關地

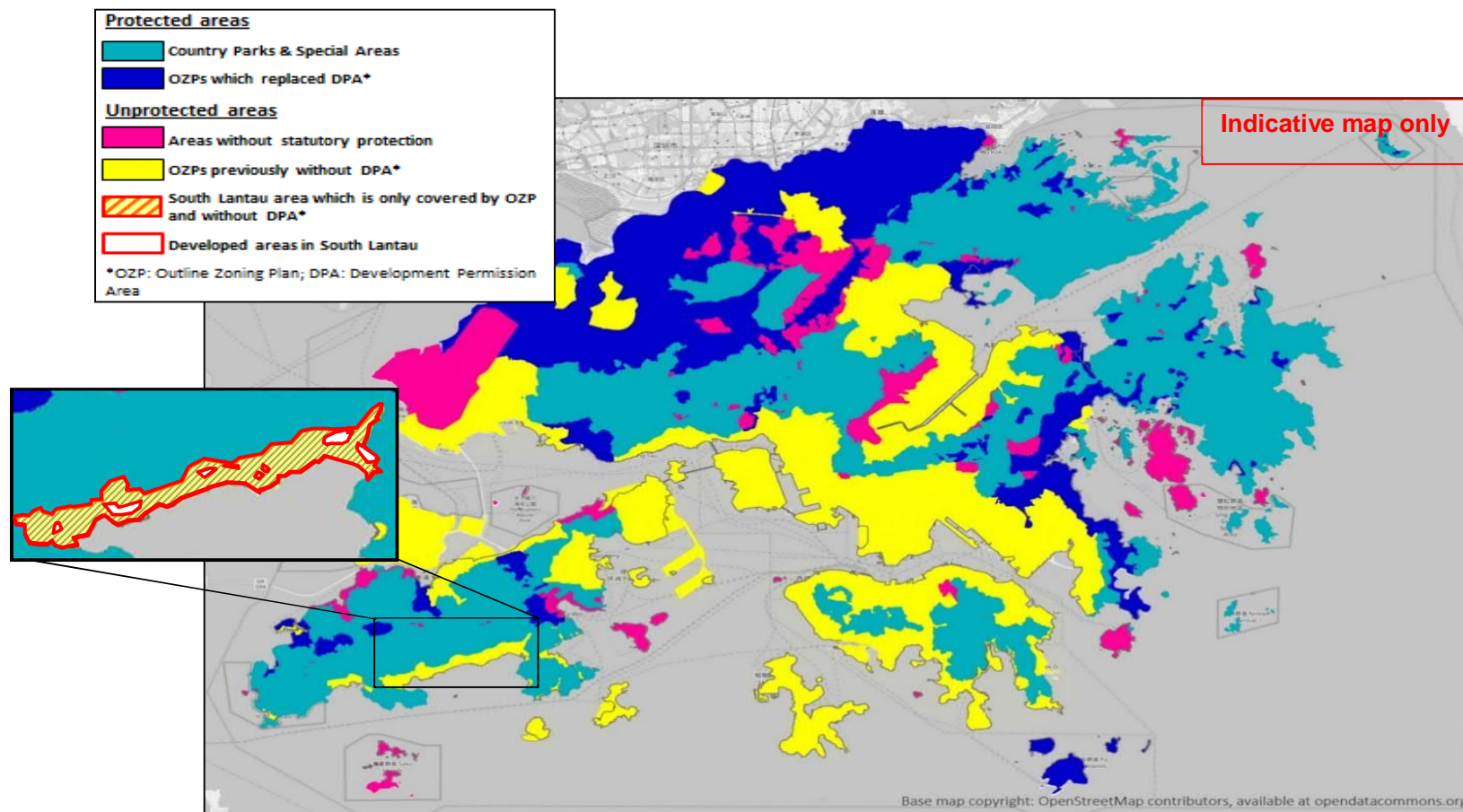
權與自然保育互相排斥的困局，提供可行的雙贏方案，使土地擁有人騰出高保育價值的土地，交與保育基金作管理，而持有人則予以相應可發展的用地作交換。信託基金可與當地社區攜手進行生態及生境管理，確保這些高生態價值的區域得到妥善管理。

另外，我們認為政府加強土地用途規管對保育極之重要，可賦予規劃署執法權力，打擊已被設定分區計劃大綱圖（OZPs），但未被發展審批地區圖（DPA）所涵蓋的地方、及任何沒有法定圖則所保護的地方內不受規管的發展，例如南大嶼山（見圖一）保育價值甚高，卻只被納入分區計劃大綱圖(OZPs)，而未受發展審批地區圖(DPA)保障，此海岸線急需法定保護，以免重要的生物多樣性及生態系統功能因不受規管的發展而受到破壞。

WWF 促請政府採取以下措施：

- i) 透過修改法例，將所有土地納入法定土地使用規劃之內，使其受發展審批地區圖（DPA）規管，並以分區計劃大綱圖（OZPs）規管土地用途。
- ii) 透過成立自然保育信託基金，解決目前有關地權與自然保育互相排斥的困局，並提供可行的雙贏方案，使土地擁有人騰出高保育價值的土地，交與保育基金作管理，而持有人則予以相應可發展的用地作交換。透過商討及長期融資確保有足夠資金獲取土地作長遠自然保育。

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圖一：香港法定受保護及未受保護範圍（圖片擷取自香港觀鳥會¹並由世界自然基金會香港分會於2019年7月加入說明項目及補充資料）

¹香港生物多樣性及保育重點指標報告 2015-2017。(2018)。1st ed。香港：香港觀鳥會，頁48。

WWF-Hong Kong

Recommendations for 2019-2020 Policy Address





Transform Hong Kong into Asia's Most Sustainable City

WWF-Hong Kong urges the Government to review, further consider, and implement the 2018-2019 Policy recommendations that were submitted last year. These remain important and deserve further consideration. For the 2019-2020 Policy Address, WWF-Hong Kong recommends the following policies for consideration and adoption by the Chief Executive:

1. Expanding Marine Protected Areas: Critical for our Coastal Waters

WWF-Hong Kong continues to stress the importance for Government to designate and expand marine protected areas (MPA), in particular West and South Lantau waters, with strict smaller no-take zones embedded within the MPA as they have enormous biodiversity and fisheries benefits when properly configured and enforced. MPAs are essential for restoring the health and resilience of coastal waters. We look forward to a true no-take zone in Hoi Ha Wan Marine Park in the near future.

MPA networks need to be developed and managed within a broader program of marine spatial planning and watershed management. A robust MPA network helps fulfil Hong Kong's obligation under the Convention of Biological Diversity and its own actions planned for dolphins and other marine species under the Government's Biodiversity Strategy and Action Plan. WWF Hong Kong considers active measures will be needed by the Government to:

- i. Allocate budget to conduct feasibility studies for the establishment of MPA more broadly in 30% of waters in Hong Kong, to identify a network of science-based strict no-take reserves, fisheries management zones, community-based fisheries reserves, and other marine protected area designations;
- ii. Designate an expanded network of strict no-take zones embedded within the MPA system as they have enormous biodiversity and fisheries benefits when properly configured and enforced.

This Year is probably the last chance for Hong Kong to Save its Iconic Chinese White Dolphins

The decreasing dolphin population in Hong Kong is an urgent call for Western and Southern Lantau waters be managed as Hong Kong's Dolphin Conservation

Management Zone with several nearshore critical habitat zones where the speed and use of vessels will be strictly managed. The Lantau Dolphin Conservation Management Zone can contribute to Hong Kong's ongoing efforts to expand the marine protected area system to cover 30% of Hong Kong's marine environment by 2030, through gazettement of a network of science-based strict no-take reserves, fisheries management zones, community-based fishery reserves, and other MPA designations benefitting from well-enforced and science-based management.

The dolphins have been found shifting their favored habitat southwards since 2015, likely in response to disturbance associated with multiple coastal development projects underway in North and Northeast Lantau waters. On top of the challenging conditions off South Lantau stemming from boat and ship noise disturbance and potential collisions with vessels, a sound propagation modelling study conducted by WWF Hong Kong last year estimated that the soon-commencing pile-driving for the construction of liquefied natural gas terminal off Southeast Soko Islands is likely to significantly disturb dolphins in the area, including those found in the proposed South Lantau Marine Park. This activity further threatens the shrinking local dolphin population. Much of the critical dolphin habitats that have been identified by both Agriculture, Fisheries and Conservation Department's monitoring report and WWF's underwater sound studies are not within any currently committed marine parks. The existing and proposed marine park as a mitigation area for the third runway construction does not meaningfully address the needs of the dolphins. They are not utilizing the reserve habitat as they did before the construction and there is no sign of their return. To stabilize and recover the remaining dolphin population, WWF Hong Kong proposes the following measures be adopted by the Government as a matter of urgency:

- i. Expand and connect the existing marine parks to establish a science-based, well-connected, and well-managed network of critical foraging, socializing, and resting habitats. By 2020, establish Dolphin Conservation Management Zone across the Western and Southern Lantau waters, with critical foraging and resting habitats strictly managed in terms of vessel traffic and speed;
- ii. Set up a community-based working group that includes relevant government authorities, academics, NGOs, local community, dolphin-tourism companies, fishers, and village leaders to co-manage the Dolphin Conservation Management Zone;
- iii. Require development projects to robustly assess the impacts of construction, especially noise impacts associated with piling placement, on local Chinese White Dolphin (CWD) populations in the Environmental Impact Assessment.

WWF-Hong Kong reiterates that reclamation of marine areas should be avoided as it destroys important coastal habitats that are important for the survival of the CWD, finless porpoise, and many other marine species. Putting rocks in the ocean is not a good way to treat our planet.

2. Treat wildlife crime as a serious crime to comply with Hong Kong's international obligations

Hong Kong is now being recognized as an illegal wildlife trading hub globally which is a very poor image for the city. To address the issue effectively, fundamental change in our approach will be needed to include wildlife crime offences under Schedule 1 of the Organized and Serious Crimes Ordinance (OSCO) to further deter transnational criminal enterprises who use Hong Kong as a major port and transportation hub for wildlife smuggling. We must do more by treating wildlife crime as a predicate offence for money laundering and use Anti-Money Laundering (AML) tools in the prosecution of wildlife crime offences, in compliance with the Financial Action Task Force (FATF) Recommendation 30.

Between 2013 and 2017, a total of HK\$560 million worth of wildlife products were seized. These included illegal ivory, pangolin scales and rhino horns, potentially equal to what would be found on 3,000 dead elephants, 65,000 dead pangolins and 51 dead rhinoceros. The January 2019 container seizure had 1,000 tusks and 8 tonnes of pangolin scale alone in a single shipment from Nigeria. Among the 379 seizures from 2013 to 2017 revealed in a recent report, most came from shipping containers arriving from at least 45 countries, with about 70% from East Africa. However, only **1%** of the cases led to prosecution.

The ivory and pangolin trade in Africa meets the definitions of organized crime of United Nations Office on Drugs and Crime (UNODC) and the Hong Kong Government. This high volume and high value trade network does not change from a highly organized criminal network to unorganized crime when it arrives in Hong Kong or other Asian ports. Upgrading of wildlife crime offences in Hong Kong will not only facilitate prosecution, but also enable investigations into money laundering. In compliance with FATF and Convention on International Trade in Endangered Species of Wild (CITES) recommendations, AML tools can be used in the prosecution of wildlife crime offences. This would enable compliance with FATF Recommendation 30 and generally accrue three operational benefits including: identifying additional evidence to support the prosecution of the predicate offence; identifying others involved in the wider criminal network; and identifying the profit from the crime, enabling successful restraint and eventual confiscation of the proceeds.

With Hong Kong vigorously pursuing free trade policy and firmly believing in multilateral trading system, the OSCO upgrading will ensure that Hong Kong fulfills its commitments to Asia-Pacific Economic Cooperation (APEC) on illegal wildlife trade (IWT). Strengthening actions on IWT is also in line with Hong Kong's commitments outlined in APEC agreements: 26th APEC Ministerial Meeting, and the APEC 2015 Leaders' Declaration to take actions to combat wildlife trafficking and related corruption. WWF urges Government to:

- i. Include wildlife crime offences under Schedule 1 of the OSCO to further deter transnational criminal enterprises who use Hong Kong as a route for wildlife smuggling so that our enforcement agency can tackle criminal enterprises with a holistic view as a whole, from source to buyer and smuggler to kingpin, instead of focusing solely on smugglers, who have less influence in the criminal enterprises;
- ii. Further strengthen communications with source countries of wildlife products through Hong Kong Police Force's Crime and Security Department and its Liaison Bureau to develop criminal intelligence on wildlife transnational crime syndicates;
- iii. Further strengthen Government's Wildlife Crime Task Force and work more closely with China's National Inter-agency CITES Enforcement Coordination Group, the International Consortium on Combating Wildlife Crime and other regional Wildlife Enforcement Networks. This will help intelligence analysis and resources tasking, which are needed to identify and tackle illegally sourced, exported, or re-exported wildlife products.

Time is running out for African elephants, rhinoceros, tigers, and several marine species, plus thousands of other species, many of which are specifically threatened by trade into and through Hong Kong. Their extinction in the wild looms within years, not decades, and the time to act is now.

3. Decarbonisation with a clear & regulated target to limit global warming to 1.5°C

Business as usual (BAU) is not an option anymore, it is inevitable for all governments to deal with the Climate Crisis. Time is running out for effective action to address the climate emergency and global heating, as stridently conveyed in the IPCC's latest Special Report. Effective action requires participation from all stakeholders, especially government in policy making or enactment of law and regulations, and to bring about transformative change away from BAU.

Government's continued support is important to the city's decarbonization. We urge the Government to introduce a decarbonisation financing scheme that replicates the success of energy efficiency and renewable energy projects within government properties to all open spaces, government infrastructure, such as highway noise enclosures and privately-owned buildings. We also urge the Government to set a 50% energy saving improvement target by 2050 with a mandatory climate change mitigation and adaptation building scheme for all new and existing buildings; to set a 10% renewable energy target by 2030 and implement low-carbon pilot villages in local communities; and to establish an extensive native-species reforestation program for extant grassland areas to contribute to carbon sequestration and make Hong Kong more carbon neutral.

To reach the ambitious 10% renewable energy goal by 2030, one of the solutions will be for Hong Kong to diversify and magnify solar PV technology, by placing solar PV systems on government and community buildings, in open spaces, along vertical faces of buildings, and on highway infrastructure with large surface areas, such as noise enclosures. In this connection, the Government can leverage available and particularly solar energy innovations in vertical solar panels and curtain walls that suit the unique skyscraper city design in Hong Kong. For a long-term decarbonisation strategy, building energy efficiency is a key focus area to reduce electricity consumption across the city. To help achieve this, the Hong Kong green building model should be made mandatory and add a focus on climate change. One can incentivize decarbonisation locally and regionally via financing by HKSAR-based institutions. WWF advocates the following actions from the Government:

- i. The Chief Executive to lead all government departments, public bodies, and agencies to develop and commit to science-based targets in line with limiting global warming to 1.5°C;
- ii. Set up a policy framework by exploring all options available including through legally binding carbon budget as appropriate to contribute to limiting global warming to 1.5°C with a 50% energy saving improvement target by 2050;
- iii. Formulate a central procurement policy in line with limiting global warming to 1.5°C;
- iv. Introduce a decarbonisation financing scheme that replicates the success of energy efficiency and renewable energy projects within government properties to all open spaces and privately-owned buildings;
- v. Establish a mandatory climate change mitigation and adaptation building scheme to all new and existing buildings;
- vi. Set a 10% renewable energy target by 2030 and implement low-carbon pilot villages in local communities powered by solar energy;
- vii. Establish an extensive, whole landscape-scale native-species reforestation program for extant grassland areas to contribute to carbon sequestration with a view to making Hong Kong more carbon neutral.

4. Increase Hong Kong's Integration of Sustainably Produced/Marketed Natural Resources and Decrease its Ecological Footprint

Awareness on sustainable lifestyles has risen in Hong Kong in the past few years on the use of biological resources such as shark fin, seafood, paper and non-biological resources such as plastic. However, a gap between awareness and action still exists in Hong Kong. Hong Kong's ecological footprint is the second worst per-capita in the Asia-Pacific region and tenth worst globally. If everyone led the lifestyle of Hong Kongers, 4.2 Earths would be required to fulfil our resource needs in 2019, a significant increase from the 2016 figure of 3.9 Earths. Consumption and trade in some of these species is even leading to listings as threatened species.

We urge the Government to effectively regulate labelling to increase transparency on wildlife food products and their provenance and means of production; and to promote the use and importance of moving to natural resources that are being produced in ways that are biologically sustainable with a pilot project focused on pre-packaged marine species. To change market practice, motivation will be useful. We suggest the Government to develop a city-wide credit rebate system to provide incentives to businesses and consumers for promoting sustainable products.

Hong Kong is not only a leading international city, but also a trading hub and consumption center for different products around the world. Incentivizing businesses and consumers toward practicing sustainable consumption can help reduce Hong Kong's negative impact on the world's natural resources and, also, act as a driver for a growing green economy — an important step towards Hong Kong becoming the most sustainable city in Asia. WWF Hong Kong recommends the Government to implement the below strategies:

- i. Regulate labelling and increase transparency on wildlife food products with a pilot project focused on pre-packaged marine species;
- ii. Lead the society towards sustainable consumption through the launch of a 'credit-rebate system', to encourage businesses to trade more sustainable products and reward consumers and retailers for practicing sustainable trade and consumption;
- iii. Ban all polystyrene tableware by 2022;
- iv. Provide a clear timeline on phasing out all single-use plastic tableware upon completion of the Government's consultancy in 2021;
- v. Establish an aid fund for the food and beverage industry to roll out incentive schemes for customers to bring their own cutlery and container;
- vi. Implement the Pilot Scheme on Collection and Recycling Services of Plastic Recyclable Materials in Sai Kung and Central piers;
- vii. Develop a regulated Extended Producer Responsibility (EPR) system for plastic packaging and tableware in supermarket and food and beverage industry.

5. Securing the future for land of ecological importance

One-third of land in Hong Kong is not regulated by any statutory land use planning and control system (Fig. 1). In particular, private land with ecological value is vulnerable to unauthorized habitat destruction activities, modification of land use and development pressure. Our precious local biodiversity is at risk and WWF Hong Kong supports a Conservation Trust Initiative that resolves the current land rights deadlock to provide feasible alternatives for landowners to release land for biodiversity conservation by the Trust. This can assure the best outcome for use of

ecologically important land by the Trust working with communities on areas set aside for eco experiences and habitat management.

We consider it extremely important for the Government to improve land use planning and to enable the Planning Department to take enforcement action against unauthorized development in both areas that are solely covered by Outline Zoning Plans (OZPs) without any Development Permission Area (DPA) Plans and areas that have no statutory land use plans. For example, the South Lantau area (indicated in the inset map in Fig. 1) with high conservation value, is covered by OZPs only and without any DPA Plan. This key biodiversity and ecosystem service coastline needs protection from unauthorized development. We urge the Government to consider these measures:

- i. Cover all land by statutory land use planning with DPA Plans and regulate land uses under OZPs;
- ii. Establish a regulated Conservation Trust to provide feasible alternatives to the landowners, such as land swaps, to resolve the current land rights deadlock, while securing land for biodiversity conservation through negotiation and long-term financing.

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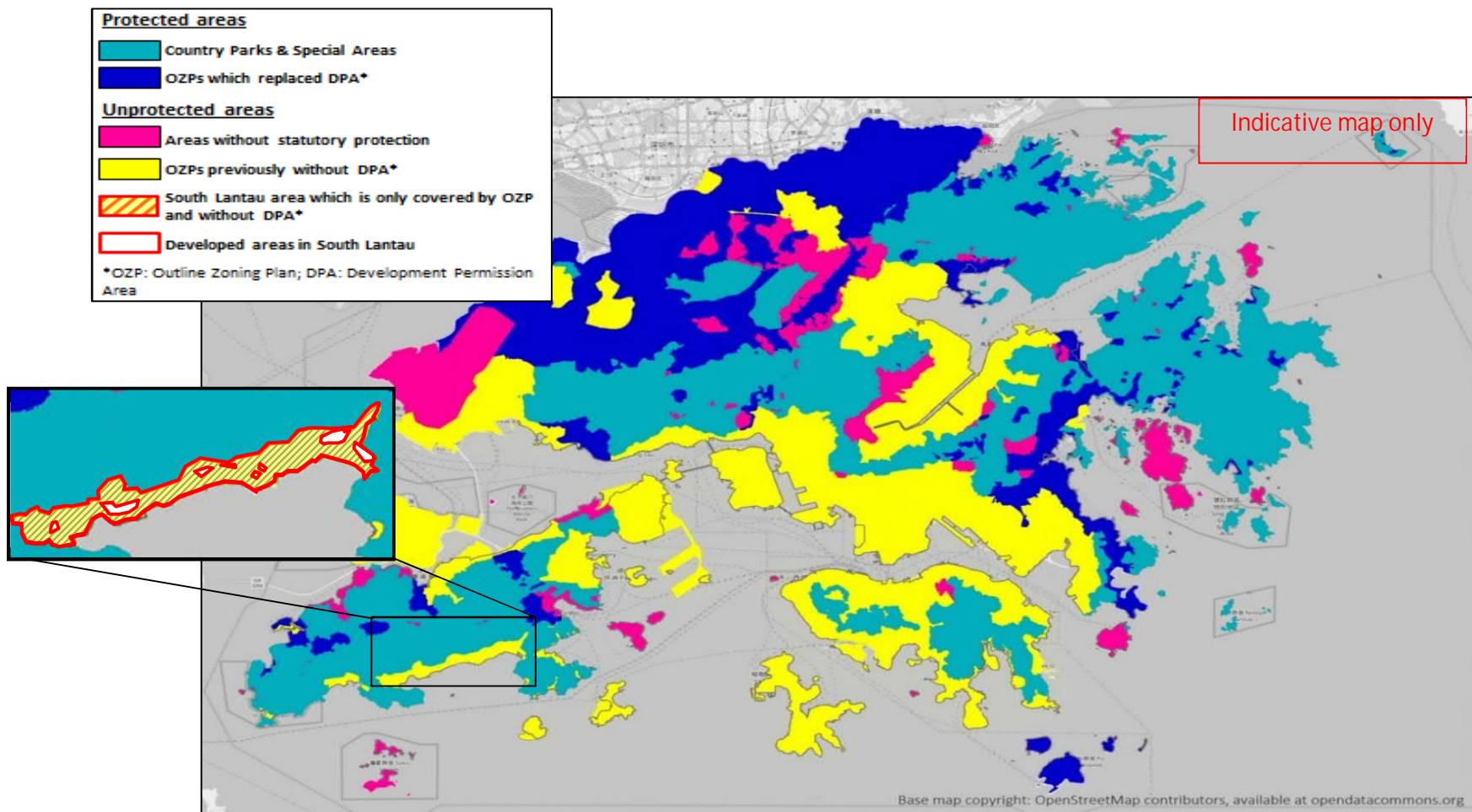


Figure 1. Location of statutorily protected and unprotected areas in Hong Kong (Adapted from Hong Kong Bird Watching Society¹ with revised legend and additional information added by WWF-Hong Kong in July 2019)

¹ Hong Kong Bird Watching Society. 2018. Hong Kong Headline Indicators for Biodiversity & Conservation 2015-2017 Report. Hong Kong Bird Watching Society, Hong Kong SAR. 48 pp.