



世界自然基金會  
香港分會

WWF-Hong Kong

香港新界葵涌葵昌路 8 號  
萬泰中心 15 樓  
15/F, Manhattan Centre  
8 Kwai Cheong Road  
Kwai Chung, N.T., Hong Kong

電話 Tel: +852 2526 1011  
傳真 Fax: +852 2845 2764  
wwf@wwf.org.hk  
wwf.org.hk

**Chairman and Members of Panel on Environmental Affairs, Legislative Council**  
(c/o Clerk to Panel on Environmental Affairs)  
Legislative Council Complex,  
1 Legislative Council Road, Central, Hong Kong

23 March 2020  
(By post and e-mail)

Dear Sir/Madam,

**Re: Panel on Environmental Affairs Meeting on 23 March 2020,**  
**#IV “ Enhancing the recreation and education potential of country parks”**

We understand the above captioned will be discussed during the meeting of the Panel on Environmental Affairs on 23 March 2020. WWF understands the importance of connecting people to nature, as it can nurture a positive attitude towards our natural environment, enhance well-being, and promote a low carbon and sustainable lifestyle. Therefore, we applaud the overall objective to enhance recreation and education potential of Country Parks and special areas making them accessible to the community. We would like to highlight the importance of striking a balance between the role of Hong Kong’s natural areas for nature conservation and enhancing the recreation and education potential of Country Parks and special areas. To maintain this balance, we have the following recommendations:

**1. Conduct comprehensive ecological impact baseline study and assessment**

The summary of the public consultation conducted by The Agriculture, Fisheries and Conservation Department (AFCD) shows that respondents were concerned about the possible impact on ecology and opined that the suggested enhancement proposals should not cause pollution to the environment or impact on ecology. According to the administration<sup>1</sup>, AFCD will identify suitable locations with prudence and carry out detailed feasibility studies where necessary to ensure that operation of the concerned facilities will not exceed the carrying capacity of the relevant country parks.

Nevertheless, AFCD have not devised any concrete actions and mitigative measures with respect to the these concerns. Moreover, the feasibility studies pledged to be undertaken focus on the carrying capacity of different Country Parks but neglect the potential ecological impacts on biodiversity by the proposed enhancement measures and new facilities. For example, potential impacts of tree top adventures on ecologically important woodlands and wildlife species and sewage from proposed glamping sites and eco-lodges. To avoid putting pressure on biodiversity of country parks, comprehensive assessments (that is, baseline ecological studies, site selection criteria, ecological impact

<sup>1</sup> <https://www.legco.gov.hk/yr19-20/english/panels/ea/papers/ea20200323cb1-461-2-e.pdf>

**together possible™**

assessments) should be conducted for assessing potential ecological impacts. In particular, WWF considers the proposed enhancements should avoid critical habitat and known or possible occurrences of Species of Special Concern as listed in Hong Kong's Biodiversity Strategy and Action Plan (BSAP), such as Chinese Pangolin, big-headed turtle and Romer's tree frog. Habitats for these species must be protected from ecological impacts, such as poaching, disturbance from human activity, and habitat loss and degradation.

## **2. Adopt a 'red line' zones conceptual framework to diversify conservation objectives and adopt a mitigation hierarchy approach**

Country Parks and special areas should adopt a zoning plan strategy to diversify conservation objectives. Taking the Mainland government strategy as an example, ecological important areas such as national parks are put within 'red line' zones to strengthen environmental protection, with rigorous regulations and specific conservation objectives established to safeguard the ecological functions of priority areas. It is a conceptual framework similar to that of the Mai Po Inner Deep Bay Ramsar site, where a 'core zone' is designated as an area of high biological interest where only limited access is allowed for essential management, monitoring, and research purposes. Under this framework, diversified conservation objectives are specifically highlighted. For example, some areas can be dedicated to preserve historic sites while others protect endangered species and their habitats. Hong Kong Country Parks and special areas should adopt this conceptual framework, thus avoiding new facilities and human disturbance of the proposed enhancements towards vulnerable 'red line' zones (that is, important habitats and/or areas with threatened and endangered wildlife species).

We also recommend that AFCDD adopt a Mitigation Hierarchy approach for evaluating proposed developments within protected areas and natural habitats. This approach is increasingly employed around the world to evaluate development and conservation options. The successive steps of the mitigation hierarchy are to either avoid, mitigate, restore or rehabilitate, and, finally, offset or, failing that, compensate. Avoidance is the first and most important step, especially to prevent harm to biodiversity of greatest conservation concern. This includes the explicit consideration of alternative locations or approaches to development to avoid and reduce loss of biodiversity and ecosystem services. Biodiversity offsets are the last step in the mitigation hierarchy. They constitute measurable conservation gains, deliberately achieved to balance any significant biodiversity losses that cannot be countered by avoiding or minimizing impacts from the start, or addressing the damage done through restoration. Following the mitigation hierarchy enables a development project to work towards 'No Net Loss' of biodiversity, and preferably, a 'Net Gain'.

## **3. 'Wise use' zoning of country parks and special areas for recreational and education use**

The proposed enhancement projects are relevant to diversified stakeholders. For example, local community (for example, indigenous villagers) are key stakeholders with

regards to the promotion of green tourism. Cultural and environmental NGOs may involve in the improvements concerning historical relics sites, hiking trails and thematic guided tours.

It is considered necessary to zone country parks and special areas according to their intended use and conservation priority with reference made to ecological impact assessment results. Some areas of conservation importance are also suitable for education / recreational zoned 'wise use' and these areas can now be included in the scope of the Countryside Conservation Funding Scheme (CCFS). The CCFS and its advisory committee can then invite NGOs working with local communities, AFCD and other stakeholders to submit 'wise use' schemes that may cover a mix of private land, public land and country parks to provide for recreation and biodiversity education for all within our community, including disadvantaged groups and students and at the same time provide for improvements in ecological and cultural value of the 'wise use' areas.

WWF proposes nominal gate fees to users of eco-education areas with self-guiding facilities, tree top adventure areas, and glamping sites and for concessions for NGOs on any country park gate fees and for those NGOs organising HK trail fundraising events. Gate fees raised can be used to support the CCFS and its initiatives.

WWF also supports training and accreditation of eco-guides and oversight on operators within the parks. Training and Qualification schemes should operate for eco guides in country parks and special areas and be extended to other eco-tourism destinations in Hong Kong. The training needs of eco-guides should be identified with coordination by the Tourism Commission and eco guide training bodies.

Country parks and special areas are valuable natural assets of Hong Kong. It is not only because they protect the rich local biodiversity, but they also offer recreation and education opportunities to Hong Kong citizens and visitors. WWF believes in maintaining a balance between nature conservation and enhancing the education / recreation potential of country parks and special areas.

Yours faithfully,



David Olson, Ph.D.  
Director of Conservation  
WWF-Hong Kong

c.c. Secretary for the Environment, Wong Kam-sing, GBS, JP

## Appendix

The mitigation hierarchy is defined as:

- **Avoidance:** measures taken to avoid creating impacts from the outset (including direct, indirect and cumulative impacts), such as careful spatial or temporal placement of elements of infrastructure, in order to completely avoid impacts on certain components of biodiversity.
- **Minimisation:** measures taken to reduce the duration, intensity and/or extent of impacts (including direct, indirect and cumulative impacts) that cannot be completely avoided, as far as is practically feasible.
- **Rehabilitation/restoration:** measures taken to rehabilitate degraded ecosystems or restore cleared ecosystems following exposure to impacts that cannot be completely avoided and/or minimised.
- **Offset:** measures taken to compensate for any significant residual, adverse impacts that cannot be avoided, minimised and/or rehabilitated or restored, in order to achieve no net loss or preferably a net gain of biodiversity. Offsets can take the form of positive management interventions such as restoration of degraded habitat, arrested degradation or averted risk, protecting areas where there is imminent or projected loss of biodiversity.
- **Compensation:** measures to recompense, make good or pay damages for loss of biodiversity caused by a project that can fall short of achieving no net loss or a net gain. For instance, this may occur if: conservation actions have been planned to achieve no net loss; losses and gains of biodiversity have been quantified; no mechanism is in place for long term implementation; it may be impossible to offset the impacts; or compensation payments are used for training, capacity building, research or other outcomes that will not result in measurable conservation outcomes on the ground.