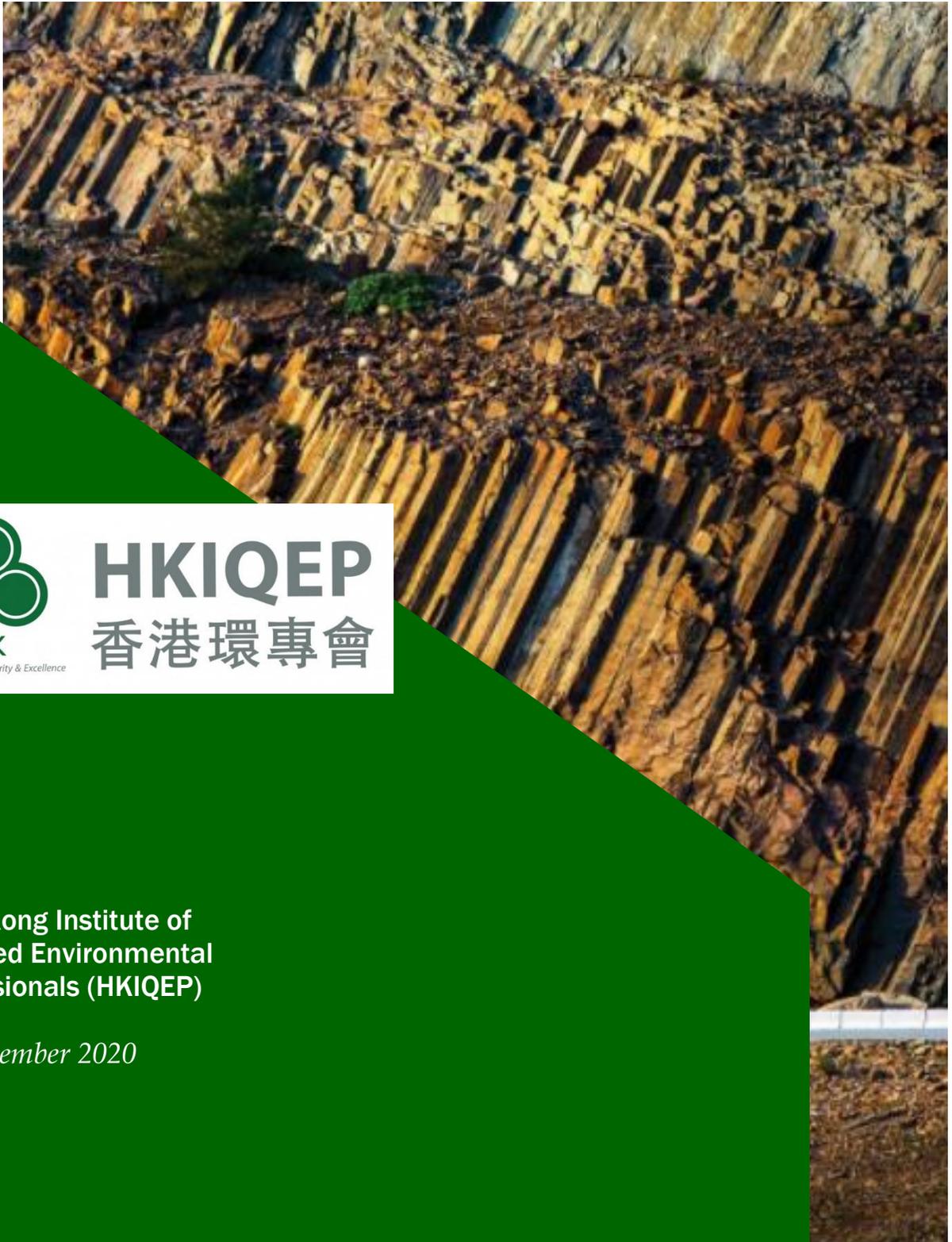


# Submission for 2020 HK Policy Address Consultation



Environmental Integrity & Excellence

**HKIQEP**  
香港環專會

**Hong Kong Institute of  
Qualified Environmental  
Professionals (HKIQEP)**

*22 September 2020*

*Photo credit: Tugo Cheng*

## Prelude

In support of the upcoming 2020 Policy Address, the Hong Kong Institution of Qualified Environmental Professionals (HKIQEP) would like to contribute its comments and suggestions in this position paper.

**We advocate for the HKSAR Government to assume green, visionary and ethical leadership to better protect our environment and ensure sustainable living and economic development in Hong Kong.**

One of THE most impactful measures that the Hong Kong SAR Government can implement is to:

“enact an Ordinance to regularise environmental professional qualifications, creating new jobs and careers for our younger generations to support Hong Kong’s green economy and ranking as a world class smart and healthy city.”

重專業， 規範環保資格  
撐青年， 創造環保就業  
保民生， 拓展綠色經濟  
共構建， 健康智慧都會

Source of background image: <http://www.ust.hk/news/news/hkust-holds-its-19th-congregation-conferring-honorary-doctorates-four-distinguished>, Hong Kong University of Science & Technology, 2011

The HKIQEP hopes that the HKSAR Government will feature some, if not all of the recommended action items set out in this paper.

# PRIORITY RECOMMENDATIONS

## Top 3 Systemic Recommendations

There are many possible areas and ways to improve the existing environmental policy-making and governance infrastructure. Given today's situation and the need to focus, we believe these three recommendations will establish a strong foundation that will help simultaneously solve a number of the Hong Kong environmental challenges we are currently experiencing, as well as strengthen our abilities to anticipate, prevent and manage future new emerging and evolving environmental issues.

### 1. Promulgation of an Ordinance to regularize environmental professional qualifications

To ensure the competency of the environmental professionals for preventing unacceptable or environmentally unsustainable developments and in line with international developments in this area, it is necessary to establish urgently a qualification registration system by law for environmental professionals. Professionals are currently challenged by the fact that their salary range is limited, and their clients have the power to influence their assessment. By enacting an Ordinance to regularise environmental professional qualifications, the HKSAR Government will provide a robust governance framework to create new sustainable jobs and careers for our younger generations to support Hong Kong's green economy and ranking as a world class smart and healthy city.

### 2. Employment of Qualified Environmental Professionals

As the importance and complexity of environmental jobs increase, it is only common sense to ensure that all sectors, including the HKSAR Government, employs qualified environmental professionals with the most relevant experience and skills in jobs that require expert environmental assessment, judgement, opinion and/or decision-making. In 2018, 45 of Hong Kong's leading companies took the lead to pledge to hire only qualified environmental professionals for designated environmental posts. If business can do it, so can government. It is time for the HKSAR Government to also adopt such a practice, given its critical roles in developing environmental policies and ensuring professional enforcement of the law.

### 3. Policy and financial support for development and training of young environmental professionals

To facilitate the creation of a new professional industry for our future generations, the HKSAR Government should provide policy and financial support for the provision of and access to relevant and appropriate training and development to support the career development of young professionals in the environmental industry. In particular, the HKSAR Government should consider the implementation of an Environmental Graduate Training Scheme (EGTS) which is similar to the engineering profession's Scheme "A" Training Scheme.

# Top 3 Topical Recommendations

## 1. Waste management

With Hong Kong's municipal solid waste volumes continuing to rise and our landfill capacity reaching its limit, reviewing the Amendment Bill is a critical and urgent priority. The Waste Disposal (Charging for Municipal Solid Waste) (Amendment) Bill 2018, should be brought back to the Legislative Council (LegCo) as soon as possible. After years of preparation and around 34 hours of discussion in over 15 Bills Committee meetings, we already have the foundation for us to move forward with passing an Amendment Bill that will help us build our own capability in solving our waste management problem, as well as finally catching up with other Asian cities like South Korea and Taipei.



Source: Hong Kong Blueprint for Sustainable Use of Resources, 2013-2022, Environment Bureau, HKSAR Government

## 2. Land use & conservation

Given the urgent need to develop more housing, HKIQEP submitted a response to the Task Force on Land Supply's Public Engagement exercise in 2018 (<http://hkiqep.org/wp-content/uploads/2018/09/HKIQEP-Views-and-Suggestions-on-Hong-Kong-Land-Supply.pdf>), which set out 3 levels of prioritisation of the land use options, in

order of descending desirability. Since the Lantau Tomorrow Vision (LTV) is basically an expansion of the East Lantau Metropolis (ELM) option #2, which was in our 2<sup>nd</sup> level of priority, HKIQEP supports serious consideration of this option and believes that the Government should expedite the relevant technical feasibility studies with due consideration of the associated environmental issues by conducting extensive environmental impact assessment (EIA) studies. Due to the size of LTV, a Strategic Environmental Assessment (SEA) should be conducted as soon as possible, in addition to an extensive EIA at the detailed design stage. With proper planning, environmental impact assessment and mitigation, it is possible that potential ecological and environmental benefits can be incorporated to provide development of a high-quality living environment.

## 3. Climate change

To combat climate change effectively, it is necessary to tighten Hong Kong's target for 2030 to about 50% reduction (or no less than 40%) from 2010 carbon emissions and commit to a net-zero target by 2050 (see our response to HKSAR Government's consultation on Hong Kong's Long-Term Decarbonisation Strategy

<http://hkiqep.org/wp-content/uploads/2019/09/Views-Collection-Form-of-Decarbonisation-Strategy-HKIQEP.pdf>).

There are recent hints that Mainland China is considering the possibility of a carbon neutrality target by 2050 and so it is important that Hong Kong continues to press on with decarbonizing as much as it can to not risk falling behind

(<https://www.climatechangenews.com/2020/09/16/china-willing-contribute-beijing-signals-carbon-neutrality-intent/>).

## DETAILED RECOMMENDATIONS

Our detailed recommendations are divided into three categories:

- Systems and processes (ENB/EPD can lead);
- Environmental aspects (ENB/EPD can lead); and
- Strategic projects and infrastructure (which will require cross Government bureau/department cooperation).

### Systems & Processes

#### Strengthen the competency of environmental professionals

Environmental professionals play the most important role in promoting the transition of economies towards more sustainable development not just for Hong Kong, but also for the Greater Bay Area and other parts of the world. It is imperative that they are qualified and competent to facilitate the strong and sustainable economic and ecological growth and development of the region. To ensure the competency of the environmental professionals for preventing unacceptable or environmentally unsustainable developments and in line with the international development, it is necessary to establish urgently a qualification registration system by law for environmental professionals. The HKIQEP has been aiming at transforming Hong Kong into a centre of excellence for developing qualified environmental professionals. Being the most stringent and relevant with full coverage of all environmental aspects, its environmental qualifications are suitable for statutory recognition.

#### Improve the environmental impact assessment (EIA) system

It is expected that large scale development projects will be launched to address the housing and land shortage problems. It is necessary to ensure the associated environmental assessments will fully observe the environmental laws with strict adherence to the environmental management hierarchy in the order of avoidance, minimization, mitigation and compensation. Amongst others, one issue needs to tackle is on how to facilitate developments without compromising the need for the tightening of AQOs for achieving the WHO air quality guidelines. It is appropriate to revise the EIA approval criteria under the Air Pollution Control Ordinance to prevent the developments from causing a "significant impact" (e.g., not to exceed 1% of the relevant AQO at sensitive receivers) that will threaten the attainment of AQOs.

#### Institutionalize strategic environmental assessments (SEAs)

When it comes to land use planning, having a more strategic approach is critical for optimal results and so we should review and strengthen the practice of conducting Strategic Environmental Assessments (SEAs) and further embed it into our existing major planning and strategic development processes and studies. Projects such as the Lantau Tomorrow Vision or redesignating Green Belts to meet Hong Kong's urgent housing needs, would be good candidates for an SEA.

Although HK was the first to implement SEAs, we have since lost momentum and have not conducted a substantive one since 2007 (or 2010 if we count the land use-related one referred to in this paper (<https://conferences.iaia.org/2014/IAIA14-final-papers/Lai,%20Raymond.%20%20SEA%20Hong%20Kong%20experience.pdf>)). If we do not pick up on our pace of SEA implementation, we will fall behind Mainland China. After implementing Planning EAs in 2003, they are now looking into promulgating Policy EAs. Hong Kong experts have been consulted by Mainland counterparts on Hong Kong's SEA because we were seen as the pioneers on this. However, since Hong Kong has not done much on it since 2007, the lack of implementation or improvement since then has only served to demonstrate that Hong Kong has lost its leadership role.

### **Strengthen regional cooperation on environmental protection**

Under the Outline Development Plan for the Guangdong-Hong Kong-Macao Greater Bay Area (GBA), taking forward ecological conservation and developing a quality living circle in the GBA are two important areas of development. To pursue green development and ecological conservation, it is necessary to provide additional resources to enhance the cooperation in ecological and environmental protection among Guangdong, Hong Kong and Macao and enhance ecological and environmental systems in a concerted manner. The institutional setup should also be strengthened to better direct and oversee the progress of the regional cooperation on environmental issues.

## **Environmental Aspects**

### **Strengthen climate-friendly policy and commitments**

Climate change is an urgent global environmental threat that poses serious risks to health, livelihoods, the supply of food, water and energy, security, and the sustainable economic growth of society. Being a coastal city, Hong Kong is especially vulnerable to climate risks, such as severe heatwaves, floods, storms, etc. To combat climate change effectively, it is necessary to tighten Hong Kong's target for 2030 to about 50% reduction (or no less than 40%) from 2010 carbon emissions and commit to a net-zero target by 2050 (see our response to HKSAR Government's consultation on Hong Kong's Long-Term Decarbonisation Strategy <http://hkiqep.org/wp-content/uploads/2019/09/Views-Collection-Form-of-Decarbonisation-Strategy-HKIQEP.pdf>). A comprehensive decarbonisation strategy needs to be implemented to achieve these targets as soon as possible through proactive climate-friendly measures including low carbon lifestyle, zero carbon energy, energy saving, net zero carbon building and transportation, etc. As renewable energy (RE) is one of the key elements for achieving the net-zero target, there is an urgent need for a regional cooperation to tap into the RE potential available in the Mainland and incentivizing wider local uses and exploitation, e.g., by maximizing the utilization reservoirs, building roof tops and façades and other open spaces for RE applications.

Hong Kong should continue its efforts in building its climate adaptation and resilience capabilities. It has already been doing well so far, but with the current advances in technology, we can continue to

learn how to integrate cutting edge technologies in sensing and artificial intelligence to improve and become a city leader in climate resilience in the region.

### **Improve air quality and tighten air quality objectives**

Hong Kong's air pollution remains unacceptable. In particular, the continual rising trend of ozone is very undesirable and worrisome. Improving the air quality for safeguarding the public health should be regarded as a priority issue. In addition to forceful actions to reduce local emissions, further strengthening of regional cooperation is vitally important. There is also a need for a re-visit of the new particulates and sulphur dioxide air quality objective (AQO) proposal recently put forward by the government. Being too lenient and fully met for quite some time, the proposed AQOs should be revised and tightened as soon as possible to ensure continual achievement of the WHO guidelines. To improve the AQO review process and its public acceptance, a standing AQO review committee should be established for ensuring the quality of the review and devising the air quality management plan and timeline for achieving the revised AQOs.

### **Tackle waste management in a holistic manner**

With Hong Kong's rising volumes of waste and diminishing landfill capacity, the Waste Disposal (Charging for Municipal Solid Waste) (Amendment) Bill 2018, should be brought back to the Legislative Council (LegCo) as soon as possible. After years of preparation and around 34 hours of discussion in over 15 Bills Committee meetings, we already have the foundation for us to move forward with passing an

Amendment Bill that will help us build our own capability in solving our waste management problem, as well as finally catching up with other Asian cities.

Recent reports on the current undesirable state of our recycling industry has perhaps affected the LegCo deliberations on the Amendment Bill. It is therefore important that the HKSAR Government support the recycling industry not just with financial subsidies which it is already doing, but to also provide and/or endorse:

- technical design and operating standards, principles and requirements for recycling processes and facilities (to prevent unintended negative environmental impacts),
- industry guidelines and standards to ensure safety of employees, and contractors involved with the collection, processing and delivery of recycled materials, as well as customers who are receiving them,
- employing qualified professionals in critical decision-making roles, and
- adopting a longer-term vision, by exploring the feasibility of allowing the import of waste for the purpose of recycling, to create enough critical mass for Hong Kong to become a centre of excellence in recycling in the GBA.

These will help to boost the performance of our recycling industry by ensuring that the appropriate technologies, practices and experienced talent are being employed to deliver high quality recycled materials. Creating new regulations and standards will create new job opportunities as well as increase quality of output and prevent unintended pollution. By aiming to be one of the world's best recycling locations, this can create new market opportunities for HK within the GBA.

## Review land use & conservation

In HKIQEP's submission to the Task Force on Land Supply's Public Engagement exercise in 2018 (<http://hkiqep.org/wp-content/uploads/2018/09/HKIQEP-Views-and-Suggestions-on-Hong-Kong-Land-Supply-.pdf>), we grouped the land use options into our 3 levels of prioritization:

- Options with environmental benefits or low environmental concerns – first priority to proceed;
- Options with some environmental concerns – viable but would require a robust EIA and/or SEA; and
- Options with high environmental concerns – proceed with great caution.

In the highest concern level c), it is opined that option #6 of developing two pilot areas on the periphery of country parks, should not be pursued. If we have no choice but to pursue option #6, then we must address this in a robust and systematic manner and so we would recommend instead to go for option #7 of exploring where there could be possible development of more areas on the periphery of country parks, through the development and application of a systematic set of rules and requirements to robustly justify the redesignation of the periphery areas. An SEA perhaps in tandem with a BSAP review (next section), should be undertaken to assist in delivering this set of systematic principles and requirements for determining which periphery areas can be utilised to help meet our urgent housing needs.

## Develop the next BSAP

The HKSAR Government issued the first city level Biodiversity Strategy and Action Plan 2016-2021 in December 2016 ([https://www.afcd.gov.hk/english/conservation/Con\\_hkbsap/files/HKBSAP\\_ENG\\_2](https://www.afcd.gov.hk/english/conservation/Con_hkbsap/files/HKBSAP_ENG_2)

.pdf).. It is necessary to find out the progress of the list of 23 Actions (and specific actions) in Four Areas in the Hong Kong BSAP 2016-2021. In particular, the progress of:

- Action 2 - Conserve ecologically important habitats outside the existing protected areas;
- Action 5 - Step up enforcement against wildlife crime;
- Action 9 - Incorporate biodiversity considerations in planning and development process;
- Action 14 - Conduct species assessment;
- Action 16 - Improve sharing of knowledge;
- Action 21 – Promote biodiversity in education.

Meanwhile, the UN Convention on Biological Diversity has just released the Global Biodiversity Outlook 5 (GBO5) (<https://www.cbd.int/gbo5>), which provides a global summary of the progress towards the Aichi Biodiversity Targets. Unfortunately, none of the 20 Aichi targets have been fully achieved and only six targets have been partially achieved. Hong Kong should speed up the process in preparing the next BSAP and take into accounts challenges highlighted in (GBO5).

## Develop a Chinese White Dolphin Species Action Plan

The Chinese White Dolphin (CWD) is an iconic species in Hong Kong and the PRD, which has been threatened by development projects throughout its range in the PRD. Annual surveys commissioned by the government indicates a continuous decline in Hong Kong waters in recent years (see [https://www.afcd.gov.hk/english/conservation/con\\_mar/con\\_mar\\_chi/con\\_mar\\_chi\\_chi/con\\_mar\\_chi\\_chi.html](https://www.afcd.gov.hk/english/conservation/con_mar/con_mar_chi/con_mar_chi_chi/con_mar_chi_chi.html)). Despite the implementation of mitigation measures of

various project EIAs, the number of CWDs continue to decline. Various research institutes, NGOs and Corporates supported WWF to release an Emergency Action Plan for the PRD Population of the CWD recently ([https://www.wwf.org.hk/en/whatwedo/oceans/advocating\\_for\\_more\\_marine\\_protected\\_areas/protecting\\_chinese\\_white\\_dolphins/](https://www.wwf.org.hk/en/whatwedo/oceans/advocating_for_more_marine_protected_areas/protecting_chinese_white_dolphins/)). The HKSAR Government should actively look into this emergency plan and formulate new actions and plans to prevent CWDs from local or regional extinction.

## Strategic Projects & Infrastructure

### Implement green transport policy

To deliver a sustainable and livable city, there is a need to strengthen urgently the environmental protection aspects of its transport policy. Amongst others, it is necessary to ensure more effective traffic management, including managing private car growth, road pricing and other effective means to reduce the overall level of vehicle transportation activity. There is also a need for a proactive shift to green and net-zero carbon transport through measures including enhancing mass and public transport, providing good network and infrastructure to facilitate safe cycling and walking. An aggressive programme should be implemented to promote speedy penetration of electric vehicles and other green vehicles/transport technologies with a view to phasing out the petrol and diesel vehicles as soon as possible. As vessel emissions are now the biggest local source of air pollutant emissions, investment in low emission vessels such as electric ferries and tightening up of the ocean-going vessels' emission requirements are urgently required.

### Promote green building and healthy living

Pursuing green design and management of buildings and the built environment provide a sustainable solution in ensuring quality living environment and reducing carbon emissions and other environmental footprints. New policy and mechanisms are required to encourage the trade to invest in sustainable and net-zero carbon building design, construction and operation. To decarbonize the existing building stocks, incentives and support for retrofitting existing buildings to improve energy and environmental performance as well as reduce carbon footprint. With the increasing awareness of good indoor ventilation and air quality management as risk reduction strategies during COVID-19, the demand of healthy building design and operation are on the rise. Currently, guidelines and standards in this area are mostly from overseas and their application in local context should be further studied and relevant guidance updated. In addition, to ensuring sustainable food supply and consumption, the green and healthy food policy should also be strengthened. Having more vegetarian diets and less meat consumption will not only help reduce significantly the carbon footprint, but also ensure more healthy living.

### Promote green economy and innovation

To ensure sustainable development and widening/diversification of revenue sources, it is appropriate to establish supportive and enabling policies to increase green economic opportunities, including in green bonds, carbon trading, and other financing or flexible mechanisms to help improve environmental quality and achieve net-zero carbon emissions. This is

particularly important to facilitate green recovery after COVID-19. Hong Kong should position itself as the centre for green finance in the region and should act to establish and consolidate a leading position without delay. In addition, there exists also a great opportunity for creating green jobs in other non-financial sectors to shift towards a low carbon, renewable-based and circular economy. Innovation on technologies, institutions, business models and policy designs will be the key to success. Policy and programmes should be formulated to drive innovation via deployment to reduce technology costs and costs of capital, and to ensure that policy mechanisms and infrastructure provide opportunities for deployment of novel solutions. It is also appropriate to invest in better use of artificial intelligence to benefit the society and environment and promulgate the necessary regulations to ensure that the advances benefit everyone.

### **Support an environment-friendly Lantau Tomorrow Vision**

In HKIQEP's submission to the Task Force on Land Supply's Public Engagement exercise in 2018, we set out 3 levels of prioritisation of the land use options in order of decreasing desirability.

East Lantau Metropolis (ELM) or land use option #2, was categorised under our 2<sup>nd</sup> level of desirability, namely "Options with some environmental concerns". These are viable land supply options with different degrees of environmental concerns. Since the Lantau Tomorrow Vision (LTV) is basically an expansion of the East Lantau Metropolis (ELM), HKIQEP supports serious consideration of this option and believes that the Government should expedite the relevant technical feasibility

studies with due consideration of the associated environmental issues by conducting extensive environmental impact assessment (EIA) studies. In fact, due to the size of LTV, a Strategic Environmental Assessment (SEA) should be conducted as soon as possible in addition to an extensive EIA in the detailed design stage. With proper planning, environmental impact assessment and mitigation, it is possible that potential ecological and environmental benefits can be incorporated to provide development of high-quality living environments. Moreover, it is recommended to adopt sustainable and resilient infrastructure design standards for the LTV project to ensure long-term benefits in terms of social, economic and environmental aspects for the society. The HKIQEP will be glad to offer further advice whenever appropriate.

### **Strengthen efforts on nature conservation**

Hong Kong is planning for more developments to fulfill its housing needs. To achieve sustainable development, Hong Kong should also expand its investment in nature conservation. Inspired by the leading biodiversity expert E.O. Wilson, the Half-Earth Project® is working to conserve half the land and sea of the Earth to safeguard the bulk of biodiversity (<https://www.half-earthproject.org/>). Hong Kong has good potential in meeting the Half-Earth goals as more than 40% of its land area has been protected and a trawling ban has been put in place. We recommend the government to examine the requirements of the Half-Earth Project and pledge to set aside half of the land and sea of Hong Kong as protected areas with a clear road map.

## HKIQEP Support

The HKIQEP will be more than glad to continue an ongoing dialogue with EnB and EPD in regards to our recommendations and to offer any necessary professional assistance to help achieve the HKSAR Government's commitments to improve the environmental quality and livelihood of the society.

Please feel free to contact us at (852) 6898 1507 or by email to [chairman@hkiqep.org](mailto:chairman@hkiqep.org) or [general@hkiqep.org](mailto:general@hkiqep.org).



*Environmental Integrity & Excellence*