

**3rd White Paper Review :
Summary of Comments on Conmsultation "Think Piece"**

Topic	Comment
Sustainability	<p>Define clearly; distinguish sustainability from conservation. 3WPR to propose sustainability objectives. Set out a HK version of sustainable development.</p> <p>Earth Summit principles give sufficient definition; review should deal with application of principles to HK. It is easier to identify what is not sustainable. Review should set out practicable, tangible and implementable agenda.</p> <p>Must acknowledge there are limits; identify and monitor them, as overshooting limits will be disastrous for environment. 3WPR to propose a strategy for this.</p> <p>Define less-tangible quality of life objectives now that AQO, WQO etc are defined.</p> <p>Use existing IUCN indicators as sustainability goals; don't water down. Must be public consultation on the indicators.</p> <p>Need an integrated strategy balancing livelihood and the environment.</p> <p>Action list and timetable to be drawn up on how to achieve sustainable development.</p> <p>Should promote sustainable agriculture.</p> <p>3WPR to set long term policy objectives and tasks, with emphasis on sustainable development.</p> <p>How to introduce sustainability throughout gov't policy areas? 3WPR should announce a high-level review of this issue.</p>
Assessing environmental impacts	<p>Subject TDSR to an EIA. Current piecemeal approach ignores cumulative impacts.</p> <p>Present EIAs are weak on ecology. Responsibility is divided between AFD and EPD; gov't is unsure how to respond to ecological challenges. 3WPR should clarify the approach.</p> <p>More public input needed from the start. Conservation principles must be built into TPO. Cumulative encroachment on habitats to be subject to proper cost benefit analyses, proper co-ordination among depts.</p> <p>Clarify public consultation procedures for EIAs.</p> <p>EIA should be a planning tool, not an impact-mitigation tool.</p> <p>More public information is needed, not just summaries. Each EIA should be a <u>feasibility</u> study, not an implementation study, with public input. EPD now denies remit to study conservation issues; AFD nowhere figures in EIA process. EIA consultants must be independent of developers.</p>

	<p>Include health risk assessment in EIAs. Improve co-ordination EPD/Health Dept</p> <p>Must legislate for EIAs, and deal with cumulative impacts.</p> <p>Set up an inventory and database of environmental projects, EIAs. Provide public access to this.</p>
Conservation	<p>New policy needed, with commitment and understanding at highest levels; a new Commission/Department reporting direct to Governor; a comprehensive approach to public education and information; overhaul of relevant legislation and administrative guidelines; a consultancy to produce a plan; committed follow-up by gov't.</p> <p>A new Department/Commission should be set up to replace present fragmented AFD, EPD, USD, AAB etc. duties. Aim for conservation as first priority, pollution control/mitigation measures as second. New body should answer to Governor, not SPEL (conflict with Lands duties); or new Branch for Conservation, Planning and Environment.</p> <p>This should be main thrust of 3WPR. Present institutional arrangements don't work. New Branch/dept roles; legislation; admin tools. Review reclamation and development strategy.</p> <p>Restructure gov't responsibilities (AFD, TIB, EPD, Sewage and Waste Authorities). Develop comprehensive strategy: consultants to draft; review committee including NGOs; Green Paper.</p> <p>Need to identify and monitor all habitats in HK. Areas outside country parks as first priority, as they are under threat. Develop conservation criteria based on inventories and rankings. Regulate and manage adverse land uses.</p> <p>Country park boundaries ignore conservation criteria; rich areas in valley bottoms/watercourses should become country park extensions. Administration of CP Ordinance led to successful legal challenges: this should change under a Conservation Dept. Definitions/criteria in present documents are conflicting and unclear. Rationalisation should allow for (a) Protected Areas (Art. 8 of BDC); (b) other areas for protection/control under TPO; (c) designation of Areas of Outstanding Natural Beauty. Set up independent Countryside Commission.</p> <p>Use s.24 of CPO to protect special areas outside country parks Declare most of NT a Development Permission Area.</p> <p>New development should avoid pristine areas, concentrate on better use of degraded land. Use legislation, financial incentives, land use measures to encourage redevelopment or rehabilitation.</p> <p>Promote in-situ conservation.</p> <p>A policy on Botanic Gardens is needed, to supplement in-situ conservation.</p> <p>Develop a Nature Conservation Strategy with S China. AFD to take on full conservation role. Review statutory bodies and their scope. Build up inventory of conservation sites, extend SSSI designation, develop robust legislative framework.</p>

Polluter Pays Principle	Assess impacts of PPP: cost vs. pollution reduction. Set out timeframe for future charges, review consultation procedures.
Land Use, Transport	<p>We lack a firm land use planning strategy. Must clean up NT; find sensible alternative locations for storage/scrap operations.</p> <p>Need clearer policies on recreation, country parks, land zoning</p> <p>Review co-ordination of land use, housing, environment and transport.</p> <p>An aggressive programme of rail/tram development is needed.</p>
Waste	<p>Major reduction, recycling and reuse initiative is needed.</p> <p>Promote waste recycling by tax measures, charges, refund systems, source separation schemes etc. Help small waste balers. Introduce extended producer responsibility. Compare landfill and incineration as strategic options.</p> <p>Govt procurement to avoid discriminating against recycled products. Industry Dept to stimulate innovation on clean production, encourage recycling/minimising of hazardous waste</p>
Energy	<p>Review schemes of control, gov't purchasing policy re energy efficiency, consumer education. Legislate standards and codes for energy efficiency. Set up a Dept of Energy.</p> <p>Set up an Energy Council.</p> <p>Improve building energy efficiency. Control imported machinery emission levels. Look for cleaner alternatives to ULP Liaise with Guangdong on Deep Bay air pollution issues.</p>
Public involvement, education	<p>3WPR must involve public discussion and consultation.</p> <p>Set up Council of Environmental Education.</p> <p>Review public notice measures etc. Review public bodies and representation.</p> <p>Liaise with creative professions to develop public awareness campaigns and change personal behaviour. Promote environmentally sound leisure and tourism activities Include local people in managing local environment.</p> <p>Extend environmental labelling for more informed consumer choice. Extend Consumer Council brief to cover this</p> <p>Review ECC and ECF with a view to sustaining the Green Groups.</p> <p>Allow green groups to help manage marine parks, dolphin sanctuaries, etc.</p> <p>Governor's Business Council to address environmental management.</p>

	Strengthen Standards regime; HK Standards Authority. Business to develop an Environmental Charter for HK; encourage self regulation frameworks.
International cooperation	HK to take part in Trade/Environment forums. More liaison with Guangdong, and public information on this.
