

25 October 2016

Professor the Hon Arthur Li Kwok-cheung, GBS, JP
Chairman, Council for Sustainable Development
45/F Revenue Tower
5 Gloucester Road
Wanchai, Hong Kong

Dear Prof Li,

Promotion of Sustainable Consumption of Biological Resources

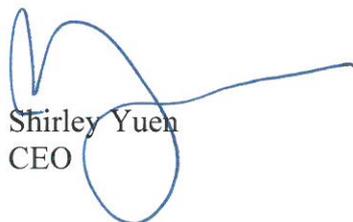
I have the pleasure to enclose a Hong Kong General Chamber of Commerce paper in response to the Council for Sustainable Development's public engagement exercise on the above subject.

While the urgency of sustainable consumption was reaffirmed in 2015 by the United Nations, Hong Kong should respond to the global call for urgent actions. We believe that Hong Kong must work smartly to mainstream sustainable consumption patterns, and empower all stakeholders to make responsible choices while respecting the environment with a mix of effective tools and instruments under definitive government leadership. To achieve this, we agree to the three key directions being put forward by the Council for Sustainable Development, and offer our views to promote behavioural changes in our paper.

Thank you very much for speaking at the Chamber on 31 August 2016. We hope our recommendations are useful, and look forward to working with your Council and the Government to develop adaptive and pragmatic strategies to promote sustainable consumption of biological resources.

Thank you.

Sincerely,



Shirley Yuen
CEO

Promotion of Sustainable Consumption of Biological Resources

A Response to the Council for Sustainable Development
by the Hong Kong General Chamber of Commerce

1. The Hong Kong General Chamber of Commerce (“HKGCC”) cares about the environment. As a business association, HKGCC aims at promoting a favourable business environment to facilitate economic development, and one of the key ingredients to achieve such an objective is to develop a sustainable and livable environment. Therefore, we have consistently advocated policy measures to address environmental challenges, and promote environmental consciousness among our membership and the general public over the years. We welcome the HKSAR Government’s recent initiative to develop the first five-year Biodiversity Strategy and Action Plan (“BSAP”) for Hong Kong. The promotion of sustainable use of biological resources is considered as an essential and integral element in conserving biodiversity under the BSAP framework.
2. Over-exploitation of biological resources has become one of the main threats to global biodiversity, and thus survival of human well-beings. Although Hong Kong accounts for less than 0.1% of the world’s population, our unique position as a major international trading hub has led to potential impact on some species of plants and animals along supply chains at the regional and global levels. For example, Hong Kong is the seventh largest per capita seafood consumer in the world – a resident consumes 71.2 kg of seafood on average each year, more than three times the global average. While the urgency of sustainable consumption was reaffirmed in 2015 by the United Nations, **Hong Kong should respond to the global call for urgent actions to abolish unsustainable practices and adopt sustainable consumption in our everyday living.**
3. The HKSAR Government, non-governmental organizations including HKGCC, and many businesses have already put in place various initiatives to preserve biodiversity, ranging from public campaigns to breeding programmes on specific species. Although some of them have achieved certain merits, the piecemeal approach does not produce the ideal result of motivating all sectors and stakeholders to adopt more sustainable consumption patterns and lifestyles collectively. Yet we rely on various types of biological resources for our daily lives, and many of them, such as some fish species and plant resources, are under the risk of depletion and exhaustion due to over harvesting and consumption. Since at least 40% of the world’s economy is derived from biological resources and our economy continues to develop, **we must work smartly to mainstream sustainable consumption patterns, and empower all stakeholders to make responsible choices while respecting the environment.**
4. Unfortunately, Hong Kong seems to be lagging behind other advanced jurisdictions in promoting and facilitating sustainable consumption of biological resources. As ecological sustainability has not been a vital concern or interest of the general public, the issue does not rank high in the Government’s agenda at present. **Given this reality, a mix of effective tools and instruments is required to facilitate fundamental changes of consumption patterns under definitive government leadership.** To initiate this process, the Government should review current policy measures, engage the trade sectors along the supply chain in discussion to develop a forward-looking plan, and study the feasibility of introducing legislation to control importation of unsustainable natural products.

5. To achieve this, we agree in principle the following three key directions being put forward on the Invitation and Response document, and offer our views and recommendations to promote behavioural changes:

A. Facilitating Smart Choices for Consumers

6. Promotion of sustainable behaviour relies heavily on providing people with sufficient information, hence eco-labels and information platforms on sustainable sources are proliferating in the supply side of the market. Although there are huge potentials in further developing the information side of smart choices, information alone is not sufficient. **The awareness-action gap remains a major barrier to changing people's behaviour.** In other words, many consumers are aware of the importance of their consumption choices, but most do not turn their environmental concerns into consumption patterns. Accordingly, information-based marketing techniques or educational campaigns may not be the most effective means to facilitate the development of sustainable behaviour.
7. We believe that the transformation of lifestyle patterns requires a fundamental change of mindsets. **People conform to social norms, and some community-based social marketing campaigns have demonstrated the effectiveness of creating new norms of desirable behaviour,** e.g. the “Keep Hong Kong Clean” and Anti-corruption campaigns in the 1970s, as well as the recent “Priority Seats” promotion. However, sustainable consumption involves a wide range of products from seafood and timber to other biological resources, and so **we have to be pragmatic in developing science-based, desirable and achievable social norms on specific consumption patterns** (to be elaborated in the “Education and Publicity” section) through mapping the ecological footprint of Hong Kong citizens, prioritizing major keystone biological resources of common concerns, identifying necessary behavioural changes, and introducing adaptive strategies with reference to successful green initiatives from abroad to achieve a “net zero” impact.
8. Public sentiment can help mainstream sustainable products in the market. Although the prices of some eco-labelled products are comparable to those of the non eco-labelled ones, eco-labels themselves are not meaningful unless a consumer has a prior positive view of the particular label. Financial incentives may be effective, but are not the only driver. Many other factors, e.g. quality, fashion and brand recognition, contribute to the purchase decision-making process. **Strategies should therefore be directed towards influencing consumers to make a “smart choice” for eco-products by delivering value-for-money,** not just a “personal responsibility” for their lifestyles.
9. Third-party certifications, such as eco-labels and voluntary certification schemes, are a good way of motivating suppliers to achieve environmental standards, but consumers are often unfamiliar with or bewildered by the wide variety of environmental standards of eco-labels in the market. While international standards, such as those issued by the International Organization for Standardization and Forestry Stewardship Council, are well recognized by the industries and consumers, **many local green standards and certification schemes require acknowledgements by the Government to enhance their popularity.**

B. Promoting Best Practices Among Businesses and The Public Sector

10. Even though green procurement guidelines, charters and voluntary commitments, and various awards scheme are important tools to encourage and recognize best practices for both businesses and the public sector, we do need more effective instruments to facilitate a wider adoption of green practices. Particularly, the concept of **“Green-by-default”** should be promoted among businesses and the public sector. HKGCC, for example, is gradually implementing paperless registration as the default option for members to enrol themselves in the 250+ events we organize a year. Shark fin and black moss have long been prohibited in HKGCC’s banquet functions, but occasionally we still need to opt out unsustainable foods from the pre-set standard menu provided by caterers. There are many ways in which businesses and the public sector can adopt as default strategies, e.g. including a green menu as the standard catering option, programming the office printers for double-sided printing by default, and turning off unnecessary lighting devices automatically during non office hours.
11. We applaud the Government for proactively applying green specifications for its procurement in accordance with mandatory and desirable requirements, widening the scope of green procurement in public works projects, and establishing an Interdepartmental Working Group to steer bureaux and departments to adopt green procurement practices for bulk and small amount purchases. **The HKSAR Government, being the largest consumer in Hong Kong, should expand its efforts to lead by example of promoting sustainable behaviour**, i.e. by allocating more budgets to procurement units within the Government for sustainable products.
12. Market mechanisms are always powerful tools to achieve policy objectives, and it is also important to leverage on market forces and level the playing fields for all businesses. To facilitate capacity building of a green market, **the Government should incentivize suppliers to offer biologically sustainable products by giving them favourable consideration among bidders, and develop a mandatory requirement in appropriate tendering exercises**. Such green procurement incentives and requirements should also be adopted by publicly-funded and non-governmental statutory institutions.
13. While the Government should continue to enhance existing conservation measures and incorporate biodiversity considerations into major development policies, it should develop a roadmap to achieve the desired goals within a specified timeframe. Having said that, **we would like to emphasize the critical importance of providing certainty and predictability of any policy changes, so that businesses can plan well ahead in response to new requirements**, e.g. blended requirement of biodiesel and restriction on palm oil. If import bans on specific unsustainable products are to be introduced, the Government should engage the stakeholders in discussion prior to policy formulation and provide an appropriate grace period for effective transition.

C. Education and Publicity

14. The general public is well aware of the fact that some biological resources are under the risk of depletion and exhaustion. However, many people are confused about the difference between biological resources and non-biological natural resources that also require conservation. **A stock-taking process is necessary to draw public attention**

towards critical and vulnerable biological resources constituting the local ecosystem. The assessment would facilitate the development of effective education programmes and publicity campaigns that help promote a green consumption culture.

15. No single activity can deal with a wide range of ecological issues, hence different initiatives are needed to promote various community and sector-specific consumption patterns. **Actions should be sufficiently ambitious so as to have a high likelihood of achieving the anticipated outcomes.** Whether they are territory-wide campaigns, incentive and reward schemes such as the “green points” for eco-products, or a series of outreach programmes through conventional and social media, the messages have to be:
 - 15.1 **Science-based** – To identify key unsustainable consumption behaviours in Hong Kong, fill the knowledge gap concerning specific ecosystem services that are important to the local community, and set science-based targets to align with global goals to maintain or improve the quality of life on the planet;
 - 15.2 **Desirable** – To encourage the changes of specific sustainable consumption patterns in the best interest of the community, and to offer alternatives to substituting unsustainable resources; and
 - 15.3 **Achievable** – To establish public confidence to achieve the targets, demonstrate foreseeable payoffs of sustainable consumption patterns and reinforce sustainable habits.
16. Social values guide people’s behaviour in the process of growth. Nevertheless, education for sustainable consumption has not been included as part of the early education in Hong Kong. In a longer term, **we need to cultivate the young generation with an initial mapping of the sense of responsible lifestyle by integrating the value of sustainable consumption into school curriculum.** It is particularly important to nurture the attitude of middle-class youth towards adopting more environment-friendly practices.
17. In conclusion, sustainable consumption of biological resources is about making smart and responsible choices to satisfy our needs while respecting the environment. As everyone is a consumer, it requires concerted efforts through a mix of effective tools and instruments of all stakeholders to facilitate fundamental changes of consumption patterns under definitive government leadership. All in all, we encourage the Government to engage with the business sector to develop adaptive and pragmatic strategies to mainstream sustainable behaviours.