

November 4, 2016

Council for Sustainable Development
c/o Sustainable Development Division
Environment Bureau
46/F, Revenue Tower
5 Gloucester Road
Wan Chai
Hong Kong

Attention: The Honourable Arthur Li Kwok-cheung, GBS, JP - Chairman

Re: Views and Recommendations from the Canadian Chamber of Commerce in Hong Kong in Response to the Public Engagement Document 2016: Promotion of Sustainable Consumption of Biological Resources

Dear Mr. Li,

The Council for Sustainable Development of the Hong Kong Special Administrative Region (“CSD”) is implementing a public engagement process on the topic of the Promotion of Sustainable Consumption of Biological Resources. The Sustainable Development Committee (SDC) of the Canadian Chamber of Commerce in Hong Kong (CCCHK) has provided leadership in advocating the business case for sustainability in Hong Kong for close to two decades. Our members are committed to actively promoting a sustainable future for Hong Kong – this includes taking care of our environment and our people, and managing our day-to-day business sustainably. CCCHK is pleased to submit this letter detailing its views on this subject for your kind consideration.

The Chamber believes that the current rate of consumption of biological resources, by the average Hong Kong resident, is unsustainable and contributing to the depletion of the Earth’s valuable biological resources. According to WWF’s [analysis on Hong Kong's Ecological Footprint](#), Hong Kong residents are living beyond the

Earth's limits. We would need 3.1 Earths if everyone globally led the lifestyle of Hong Kong's residents.¹ As a wealthy city with both strong government oversight and significant individual financial wherewithal, Hong Kong should take a leadership position in creating a society that consumes biological resources in a sustainable manner. While many Hong Kong consumers view sustainable consumption as important, these views have yet to translate into reductions in the daily use of biological resources. CCCHK aims to provide information on the importance of sustainable consumption and facilitate policy recommendations, which if transformed into policy, could create a more sustainable society for our members and the wider Hong Kong community.

The Chamber recognizes that the scale of change needed to reduce current consumption patterns to a sustainable level requires a radical reduction in individual consumption. As such, any decision to create a sustainable society must be a long-term goal akin to a marathon rather than a sprint. Given the long-term nature of such a proposal, the Chamber encourages the CSD to firstly create an approach for tracking and measuring the uptake of sustainable consumption in Hong Kong so that improvements can be monitored over time.

While sustainability is often seen as a consumer preference, the goal of achieving a more sustainable level of consumption of key biological resources must not simply be seen as a retail choice but as fundamental to ensuring the well-being of future generations. We believe that with the CSD's guidance and positive policy support, the default option for consumers can shift such that they choose a sustainable choice over an unsustainable one.

Education

A plan for sustainable development with a long term focus is required to bring Hong Kong's consumer behaviours in line with sustainable consumption levels; and education remains CSD's greatest policy tool. The CSD should ensure that education on the reasons and requirements for sustainable consumption is conveyed to the residents of Hong Kong. The CSD should engage with organizations like the Hong Kong Council of Social Service to obtain advice on how to best adopt policies that positively affect consumer mindset and behaviour.

¹ http://www.wwf.org.hk/en/whatwedo/biodiversity_and_sustainability_in_hong_kong/sustainable_city_ecological_footprint/

These educational programmes should focus on dispelling the myth that leading a sustainable lifestyle means reverting to a lower standard of living. Education should focus on the need for an equitable amount of global consumption as part of the natural development of an advanced society. Recognizing that some goods are simply more sustainable when compared to other types of goods, these programmes should also raise awareness about the importance and overall benefits of making sustainable choices. For example, the consumption of beef is much more impactful on natural habitats and climate change than the similar consumption of vegetables or other sources of protein, such as chicken. Where possible, the CSD should provide education and incentives to encourage residents to swap high-impact goods for low-impact alternatives.

- Schooling: Lessons on the importance and benefits of leading a sustainable lifestyle should be integrated into the education system and be part of the curricula at the primary and high school levels.
- General public: The CSD should engage the public through the use of media adverts and CSD-led events. This will “normalize” living in a sustainable way and bring the topic of sustainable living to the fore of conversations.
- Non-government directed: Certain businesses and not-for-profit organizations have championed the cause of developing a sustainable lifestyle amongst Hong Kong’s residents. These businesses and organizations should be provided support wherever possible.

While education remains the policy initiative that will create the most significant and lasting change, it cannot be the only tool used considering the long lead time required for change to occur. In the short and medium term, the CSD should consider some combination of the policy options proposed below to accelerate the change started by the proposed educational programme. We note that joint policy initiatives on multiple fronts have the strongest probability of success.

Policies Options for Businesses:

The CSD should encourage businesses to sell products that are produced sustainably and label these products with their sustainability attributes. To this end, the CSD should facilitate the creation of a central repository for information regarding suppliers that produce products in a sustainable manner to make it easier for businesses to adopt sustainable suppliers. Furthermore, the CSD should explain the benefits of providing

sustainable products from a profit perspective, such as the ability to profit from changing consumer behaviours as well as the positive impact on their brand from being recognized as being sustainably conscious.

Responsibly-sourced products or products with sustainable attributes can be less cost competitive relative to non-sustainable options, particularly when externalities throughout the life cycle of the product are not costed into its price. There are also cases where the true cost of an item does not reflect its status as an endangered, threatened or simply unsustainable resource. The CSD should petition the Government of Hong Kong to: (1) ban all items and products that are cited by international bodies (i.e. CITIES) to be endangered or threatened if it is not possible to prove that they are from sustainable sources (e.g. shark fin, ivory), and (2) implement taxes or levies on items that are unsustainable and/or unsustainably sourced. For example, a tax or levy could be applied to products that are cited as endangered or threatened, such as certain types of animal products (i.e. used for Chinese medicine), fish, seafood, wood, paper, palm oil, etc., where those from sustainable and/or responsible sources would be exempted. There is already a precedent of using economic instruments to change consumer behaviour in Hong Kong, such as for tobacco and plastic bags. Such an initiative would be especially effective for creating a market for sustainable seafood as we believe that consumers are price conscious and need to be made aware of the consequences of unsustainable or irresponsible consumption.

The CSD should establish and support independently-operated, recognition/award schemes for companies and businesses that promote sustainable consumption. By completing background checks and ensuring the validity of such schemes, an independent organization would build long-term trust for such certificates with the general public. To that end, the CSD should ensure that the number and types of certifications are rationalized so as to not confuse consumers.

Policies for Consumers

The CSD should enact policies to encourage the reuse of items that are lightly used or otherwise undamaged. The creation of a market for second-hand goods will reduce waste and lower consumption of virgin resources. We note that such policies would be especially effective for reducing the use of cotton and wool as clothes are often discarded even when they are undamaged because they are unfashionable.

- **Direct support:** The CSD can directly support the creation of a second-hand market by hosting events to create a market for the sale of lightly used goods, or by supporting organizations already active in

this space. Appropriate government departments can also allocate government land and /or provide rental space at a reduced rate to host flea markets or similar sustainable business events.

- **Support businesses:** The CSD can facilitate the creation of a second-hand market by encouraging businesses and organizations to use tools that are already available. One “best practice” that can be adopted is the use of websites such as Freestyle (a UK website), which is a channel for people to give away items rather than dispose of them adding to landfill. Given that second-hand markets are not common in Hong Kong, the availability of free items may be an incentive for budget-conscious residents to use these new services and help establish greater comfort in the purchase of second-hand goods.
- **Support charities:** CSD can consider raising public awareness for consumers and businesses to encourage them to work with local and international charities in Hong Kong, who are tirelessly looking for free, reusable items to support their various initiatives to help people in need within the community.

In situations where a second-hand market is not practical, the CSD should find and implement policies that encourage recycling of used clothing. In particular, city-level infrastructure for the safe collection of recycled goods is often non-existent or considerably smaller vis-à-vis the space allocated for the collection of general garbage. The lack of recycling infrastructure acts as a disincentive for residents to recycle. Ensuring that there is sufficient space to collect recycling in all existing refuse collection point and amending the construction codes to ensure that sufficient space is included in all future building designs will give residents more sustainable options. This is particularly true in office buildings where the recycling of paper waste should be encouraged. The CSD should encourage the Government of Hong Kong to replace the small recycling facilities/collection containers with larger ones throughout Hong Kong and decrease the general rubbish bins, to encourage the importance to recycle.

The Government leads the way

The CSD should encourage the Hong Kong Government to create and publish tangible goals that will act as targets for the Hong Kong Government and the public in general. The goals should include a target whereby a certain percentage of imported biological resources are produced from sustainable sources. Over time these targets should increase at a material rate. Furthermore, the CSD should encourage the Government of Hong Kong to expand its existing policies to actively operate in a sustainable manner. Given the large size of the

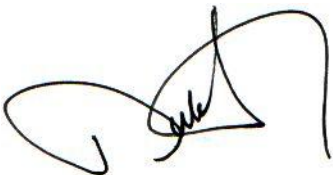
government, that adoption of sustainable operations by the government will have a material impact on normalize the act of acting sustainably.

Concluding comments

CCCHK applauds CSD and the Government of Hong Kong who have had some success in actively shaping consumer preference in the past (e.g. reducing the consumption of tobacco and plastic bags through taxation, levies and education). We suggest CSD to continue to shape consumer preference for the better: firstly through education and supportive polices that affect both business and consumers; and secondly by producing measurable statistics on the level of sustainable consumption with a commitment to tracking and improving related targets over time. CCCHK believes that given sufficient time and resources, the residents of Hong Kong can change their perspective such that the sustainable choice is the default option for Hong Kong's residents when they consume biological resources.

We thank you for considering our views.

Yours sincerely,



Derrick Lee, President, Canadian Chamber of Commerce in Hong Kong

cc:

Lawrence Nutting, Chairman, Canadian Chamber of Commerce in Hong Kong

Joseph Law, Chairman, Sustainable Development Committee, Canadian Chamber of Commerce in Hong Kong