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7th April 2016

Dear Sir,

Comments on the Biodiversity Strategy and Action Plan for Hong Kong

The Hong Kong Institute of Environmental Impact Assessment (HKIEIA) appreciates the effort of Agriculture, Fisheries and Conservation Department (AFCD) in formulation of the Hong Kong's first Biodiversity Strategy and Action Plan (BSAP) to conserve Hong Kong's rich biodiversity. Biodiversity is not only the natural assets but also provide essential resources for human well-being – fresh water and air, food, medicines as well as pleasant environment in which we live.

The Convention on Biological Diversity of United Nation identifies impact assessment as a key instrument for biodiversity conservation. The EIA system in Hong Kong has long been protecting local biodiversity through planning and implementation of ecological mitigation measures, including habitat creation and translocation of threatened species. Being the EIA professionals, we support the formulation and implementation of BSAP which further enhance the biodiversity conservation in Hong Kong.

HKIEIA would like to put forward in writing the following views based on the available information with regard to the public consultation document of BSAP and wish the AFCD of HKSAR Government could take them into account when formulating the BSAP:

1. ***Legislative Framework for Strategic Environmental Assessment*** – Although the local EIA system is effective in protecting biodiversity, the impact assessment is often focused on project-basis. To facilitate integration of environmental

considerations at early stage of formulation of programmes, plans and policies, strategic environmental assessment (SEA) is conducted, especially for major planning and sectoral studies. Nevertheless, SEA is not under the statutory requirement of EIA Ordinance and it lacks public involvement process similar to project-EIA. The legislative framework for SEA, with provision of technical memorandum and public involvement, will better make the holistic assessment and consideration on biodiversity from strategic level.

2. ***Mainstreaming Biodiversity across Government and Society*** – In addition to the EIA practitioners, all members in the government and community should recognize the values of biodiversity and their responsibility to conserve it. Mainstreaming activities should be provided to the government officials without environmental background, project proponents as well as business and development sectors. Equipped with a mindset to incorporate biodiversity considerations into planning and development process among project proponents and relevant sectors, conservation of biodiversity could be further enhanced through the professional support of EIA practitioners.

3. ***Sufficient Resources for Ecological Impact Assessment, Mitigation and Follow-up*** – Ecological impact assessment plays an indispensable role to assess and avoid the impacts to the biodiversity in Hong Kong, while ecological mitigation and follow-up measures ensure the effective implementation to conserve biodiversity. However, the impact assessment, mitigation and follow-up usually face the constraint of insufficient resources in terms of time, financial and manpower support. It may hinder the robustness, accuracy and effectiveness of the above assessments and measures. Therefore, it is advised that an appropriate weighting should be put on the ecology part during EIA process. In addition to the financial and manpower resources, knowledge resources are also important to facilitate the works of EIA practitioners in conserving biodiversity. For instance, a common biodiversity database or GIS system could be established to better quantify the impacts to the habitat or species. Guidelines and best practices regarding effective ecological mitigation measures including habitat creation and species translocation could be developed and provided to the EIA practitioners to facilitate their works in biodiversity conservation.

As a professional institute of EIA, we are pleased to liaise and provide training to our members, as to mainstream the value and knowledge on biodiversity. We stand ready to embrace successful formulation and implementation of Hong Kong's first BSAP. Through our professional expertise in EIA, we will help safeguarding a vivid and sustainable biodiversity in Hong Kong, which is passed on to the future generations.

Yours sincerely,

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David Stanton

for Hong Kong Institute of Environmental Impact Assessment

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