



BY EMAIL ONLY

Agriculture, Fisheries and Conservation Department
The Hong Kong SAR
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13 May, 2019

Dear Sir/Madam,

**Green Power's Response to
Enhancing the Recreation and Education Potential of
Country Parks and Special Areas in Hong Kong -
Public Consultation**

Overall Comments

1. Green Power, if considered as compatible with nature conservation, welcomes the enhancement of the recreation and education potential of Hong Kong's country parks to promote public's enjoyment in Hong Kong's nature.
2. We opine that such enhancement should be undergone with the following statutory and/or administrative requirements:
 - (a) Existing conservation, town planning and environmental protection ordinances should be complied, including but not limited to Country Park Ordinance, Wild Animals Protection Ordinance, Water Pollution Control Ordinance, etc.
 - (b) Different objectives set in "Hong Kong Biodiversity Strategy and Action Plan 2016-2021" should also be considered to achieve in addition to "Area 4 – Promoting community involvement".
 - (c) Conservation and education should accord higher priority than recreation.
 - (d) The construction and operation of the related facilities should not impose insurmountable and irreversible adverse impacts to country parks and special areas.
 - (e) Visitor and environmental carrying capacity of the related facilities in country parks and special areas should take into account in the site selection, design and operation. The related facilities should primarily serve local public, in view of charging fee or reservation procedures.

3. Conservation targets should be set for selected enhancement proposals. For example, how to promote “conservation effort” in “Tree Top Adventure” as stated in the consultation document.

Enhancement of existing facilities

Visitor center

4. Green Power agrees to enhance P.H.A.B* sites and facilities to increase the accessibility of country parks for people with disabilities, and enhance public education programmes to use country parks and special areas as an outdoor learning platform for nature conservation and environmental sustainability
5. Regarding improvement of hiking trails, except use of proper materials and avoiding visual impact to the natural environment, alternative methods should be explored for those segments with serious erosion or high ecological sensitivity.
6. In addition to serving as gateway, providing visitor information and basic services, visitor hubs should also support the functions of patrol and enforcement, maintaining the carrying capacity of country parks and special areas through provision of transportation and visitor admission control.
7. Therefore, the existing restriction for vehicular access to country parks and special areas must be maintained, and public transportation should be encouraged for country park visitors.
8. If eateries are proposed in the “visitor hubs”, waste disposal, water pollution and issue of wildlife feeding on refuse should be addressed. “Avoid and reduce waste at source” should be the message conveyed in country park (in addition to “take your litter home”). Waste reduction measures should be implemented (e.g. prohibit disposable eating utensils, set up water dispenser, etc.).
9. Take-away food services should be avoided as far as possible in such eateries in order not to introduce food packaging wastes into country parks. The chance for the wildlife to reach human food will also be lowered.
10. While eateries would produce lots of waste and sewage, proper waste and sewage treatment must be available to secure environmental hygiene, protect water quality of natural streams and water gathering grounds, and deter wildlife’s feeding.

Campsite

5. Existing problems of campsites in country parks need to be recognised and addressed before setting up more campsites, to prevent impacts of visitors’ misbehaviors on the natural environment from proliferating to other undisturbed parts of country parks.
6. Currently, camping on unauthorized camping sites has led to various environmental problems (e.g. refuse, hygiene) and habitat damage (e.g. loss and degradation of grassland on Grass Island). Therefore, stricter enforcement is required.

7. Existing campsites are highly depended on “self-discipline” of users, resulting in poor waste and sewage management due to the misconduct of users. Nature incompatible behaviors are observed frequently (e.g. pour boiling water/soup into the soil, wash utensils with detergent next to plantation, etc).
8. In view of the existing problems of camping in country parks,
 - (a) new sites of low environmental sensitivity and easy maintenance are preferred.
 - (b) a more stringent management with more frequent monitoring and enforcement is expected to prohibit nature incompatible behaviours of users.
9. Carrying capacity of campsites should be cautiously considered. For example, recess periods can be introduced to allow recovery of vegetation, avoid soil erosion of the sites.

Viewing platform

10. Design of “viewing platforms” should be harmonious with the landscape setting of the sites. Natural materials are preferred to construct these platforms. The footprint and impacts to the country parks should be minimized (e.g. vegetation clearance) to an extent without insurmountable and irreversible environmental impacts.

Tree Top Adventure

11. Regarding the sites for Tree Top Adventure, feasibility study is required to evaluate ecological impacts of such facility in both construction and operation phase.
12. Three sites for Tree Top Adventure are proposed and we opine that education should be a key element. As there is no precedent operation of similar scale in Hong Kong, one pilot site should be established first to evaluate its ecological and environmental impacts before more similar facilities are established.
13. Physical and physiological conditions of trees involved in the facilities should be closely monitored to avoid adverse impacts on trees. Proper management plan should be formulated to secure the user safety and other impacts of the facilities.

Glamping sites and Eco-lodges

14. We are of great concern about the extent of “convenience and comfortable tent-living experiences” that the proposed Glamping Sites and Eco-lodges intend to provide. The enhancement facilities should promote the beauty and tranquility of Hong Kong’s country parks

to the visitors, rather than scarify the undisturbed countryside to incompatible travel lifestyle, i.e. abusive use of electricity for lighting, unnecessary air-conditioning and refrigerating, broadcasting of music, heavy use of detergents/disposable products, which deviate from the functions of country parks and the purpose of the captioned study, i.e. *contributing to mainstreaming biodiversity and environmental sustainability in our community.*

For any questions, please contact the undersigned(Email: lkcheng@greenpower.org.hk) or Mr. Tommy Yu(Email: tommy@greenpower.org.hk) at Green Power (T: 3961 0200)

Thank you very much for your kind attention.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Cheng Luk-ki' with a stylized flourish at the end.

CHENG Luk-ki
Director, GREEN POWER