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Task Force on External Lighting
C/O Environmental Management Division,
3/F, Hong Kong Productivity Council Building,
78 Tat Chee Avenue, Kowloon

Email: hollyip@hkpc.org

Task Force on External Lighting Stakeholders and the Public Engagement Exercise

Views from

Business Environment Council Limited

Over the last two decades, Business Environment Council (BEC) has taken a leading role in advocating the business case for environmental excellence in Hong Kong. BEC's membership includes some of the largest companies in Hong Kong. BEC would like to provide comments on the *Task Force on External Lighting Document for Engaging Stakeholders and the Public*. Views put forward in this submission represent the views of BEC, and not necessarily its individual members.

- Government's consultation on its proposal to address light nuisance and potential energy wastage in relation to external lighting is welcome. These issues have a bearing on our daily life. In particular, energy consumption, energy wastage and energy savings are highly relevant to the broader global challenge of climate change.
- BEC recommends that a charter scheme be implemented initially, and that legislation should only be considered in light of the success of the charter scheme. As for the implementation approach of a charter scheme, owners and management of external lighting installations should pledge to switch-off their lighting installations at pre-set times and improve the design and installation

Page 1 of 3

practices. Furthermore, measures should be put in place to promote the charter and to gauge the success or failure of the charter.

- If legislation were to be introduced because the charter scheme is not meeting its objectives, it is crucial to ensure the fairness and enforceability of the regulatory regime.
- BEC takes this position for the following reasons:
 - I. Enforcement of a mandatory switch-off requirement is difficult because of the diverse land-use zoning structure in Hong Kong, consisting primarily of mixed use buildings. In many cases there may be more than one source of lighting making it difficult to identify and control the nuisance source.
 - II. The energy use in external lighting contributes to less than 1% of overall building energy consumption and any legislation in this area would not yield significant energy savings.
 - III. Since 2009 the Environmental Protection Department (EPD) has received around 200 complaints against external lighting annually. Out of 200 cases, about 10 cases are related to energy wastage. The rest of the cases are related to light nuisance but most of them are caused by functional and security lighting. As noted in the consultation document, functional and security lighting are proposed to be exempted under the scheme.
- Implementation details of switch-off requirement are to be carefully crafted, with special attention to the following:
 - Regarding scope, the exclusion of lighting necessary for security, safety or operational reasons from the proposed switch-off requirement is reasonable, otherwise, the level of security, safety, convenience, efficiency and attraction as a business hub that Hong Kong is now enjoying could be undermined.
 - Exemptions for the switch-off requirement should be granted to business with signage on the ground floor and if the business is operating after midnight, as well as functional and security lights. In addition, the current proposal provides for three days of exemptions for decorative lighting during festive seasons such as Christmas, New Year and Chinese New Year. This direction is to be welcomed and BEC supports this approach.
 - BEC supports to apply switch off requirement at pre-set times and suggests to consider each district individually. On pre-set time, the period “from

midnight to 7am” seems to be adequate for control during night time. However, a feasibility study of pre-set times for each district should be conducted in order to have a sound foundation for the charter scheme.

- Last but not least, public education is important with Hong Kong Government taking the lead to enhance the awareness and understanding of light pollution with an aim to avoid excessive use of lights. BEC recommends that Government conduct more promotion and education to the general public about issues related to external lighting. Likewise further promotion of a voluntary charter scheme would need to take place to create buy in from stakeholders, before deciding on legislation on this matter.

BEC is looking forward to working constructively with the Task Force on External Lighting in taking our policy recommendations forward. If there are any questions or concerns in regards to the content of this submission please contact our Chief Executive Officer, Ms. Agnes Li, at agnesn@bec.org.hk or 2784 3950.

Yours sincerely,

JOHN CHAI

Prof John Chai
Chairman
Business Environment Council Limited

cc Ms Agnes Li, CEO, Business Environment Council