

聯署要求政府推出配套措施 確保上網電價政策在香港有效執行

政府公佈實施太陽能及風能發電可再生能源上網電價，讓香港向前邁出一步。香港作為區內其中一個最發達的城市，為了履行其在巴黎氣候協議下的責任，必須加快提高可再生能源發電比例，並盡可能鼓勵更多持份者參與生產潔淨能源。

有鑑於此，我們促請香港政府統籌相關政策局及部門推出以下政策措施：

1. 延長上網電價金額支付期至 20 年

在目前的計劃下，上網電價金額支付期將於 2033 年底結束，削弱投資於可再生能源發電系統的意欲。若果此項制約是源於兩電的管制計劃將於 2033 年到期，我們促請政府向公眾承諾，將會竭盡所能與將來的電力公司進行談判，確保從可再生能源系統獲批准當天起計，上網電價在 20 年內維持不變，並且政府在必要時提供適當支持。

2. 修訂建築物規例

對許多住戶及建築物業主而言，在建築物規例下安裝太陽能板的合法性並不明確。我們促請屋宇署制定清晰指引以消除此不確定因素及修訂相關限制。政府可以參考台灣及首爾經驗，例如其中一個方案是容許太陽能板覆蓋天台或平台特定比例的面積，並把太陽能板的高度限制由 1.5 米調整至足以作為遮蔭之用，令計劃發揮積極作用。

3. 善用公共空間

各類公共空間的平面，例如公共屋邨、公園、運動場及水塘等，都是重要的公共資產，具有潛力安裝可再生能源系統而不影響其現有功能。

我們促請政府開放如公園及公共屋邨等較小型場地，供由當地社區成立或投資的社會企業安裝可再生能源系統並開放較大場地供企業競投太陽能發電場的安裝及營運權。這些安排需要政府高層次協調及負責管理這些公共空間的相關部門積極參與。

4. 綠色金融配套

由於安裝可再生能源系統需要較高資本投入，從而令潛在投資者卻步，我們促請政府提供額外資金支援社區項目，例如資助由非政府組織運作的設施、由當地居民成立的社會企業安裝的可再生能源系統，以至安裝可再生能源系統的專業培訓。政府已宣佈發行一千億元綠色債券，政府亦可就出售可再生能源證書的收入提供配對資助，考慮把不同類型的資金作為資助的來源。

5. 大型可再生能源系統的安裝

對於發電容量高於 1 兆瓦的可再生能源系統能否或如何從上網電價中受惠，現行政策並無提供指引，削弱投資意欲。我們促請政府就大型可再生能源系統的安裝制定清晰指引，包括太陽能及小型風電以外的可再生能源，並可以按回本期低於 10 年的假設制定上網電價。

為充分利用新政策，我們促請政府在二零一八年十月實施上網電價前研究及公佈上述配套措施。

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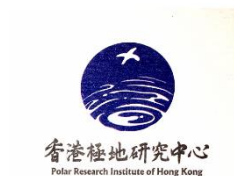
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Joint Appeal for supplementary government measures to ensure effective implementation of Feed-in Tariff policy in Hong Kong

The government announcement of feed-in tariffs (FiT) for renewable electricity from wind and solar is a positive step for Hong Kong. In order that Hong Kong can meet its obligations under the Paris Climate Agreement as one of the most developed cities in the region, it is essential that the proportion of renewable energy in electricity generation be scaled up quickly and that as many stakeholders as possible be encouraged to participate in the production of clean electricity.

To achieve these objectives, we appeal to the Hong Kong government to implement the following policy measures with the support of all relevant policy bureaux and departments.

1. Extension of FiT to 20 years

As currently proposed, the fixed termination date of FiT payments at 2033 would serve as a disincentive to investors in RE systems. If the fixed term of the scheme of control for the two utilities is an impediment to the extension of FiT beyond 2033, we urge the government to make a public undertaking that it will make a best effort to negotiate with future electricity utilities to ensure that FiT will last for 20 years at the same rate commencing from the date of acceptance of the RE installation into the power grid and act as a backstop if negotiations are not fruitful.

2. Amendment of building regulations

The legality of a canopy of solar panels under Building regulations is unclear for many residents and building owners. We urge the Buildings Department to issue clear guidelines to remove such uncertainties and to amend certain restrictions. The government may take reference from the experience in Seoul or Taiwan. For instance, one of the options is to allow solar panels to provide shade for a certain proportion of rooftop or terrace areas, and modifying height restrictions of 1.5m for solar panels to a suitable level that may allow the areas be used for shading.

3. Use of public open space

The flat surface of various types of public space, such as open areas in public housing estates, public parks, sports stadiums and water reservoirs, are important public assets which may offer good potentials for RE installations without affecting existing functions.

We urge government to release smaller sites such as those at public parks or public housing estates for RE installations by social business incorporated or invested by local communities, and to open up larger ones for companies to bid for the right to install and operate solar farms. This will require high-level coordination at senior level and the active participation by relevant departments responsible for the management of these public space.

4. Supplementary green finance

Since the high capital requirements for RE installations may be an impediment to potential investors, we urge the government to provide additional funding support to community projects, such as RE installations at facilities run by NGOs, social business incorporated by local residents, or professional training for RE installers. These funding may be mobilised from different sources, such as proceeds from the \$100 billion green bonds to be issued by the government, or from government matching grants linked to the sales revenue of RE certificates.

5. Large RE installations

The current policy provides no guidance on whether or how RE installations larger than 1 MW may benefit from FiT, which is a disincentive for investors. We urge the government to set out clear guidelines on FiT level for large installations, including renewable energy sources other than solar and small scale wind power. The FiT level may be fixed by assuming a payback period of less than 10 years.

In order to take full advantage of the new policy, we sincerely request the government to study and announce these supplementary measures as soon as practicable, preferably before the implementation of FiT in October 2018.

Co-signatories (in alphabetical order of organisation names):

350.org

CarbonCare InnoLab

Friends of the Earth (Hong Kong)

Green Sense

Living Islands Movement

RH Consultant Knowledge
Sharing Platform

The Hong Kong Polytechnic University
School of Design Alumni Association

Asian Energy Studies Centre at
Hong Kong Baptist University

Community Leap

Green Earth

Greener Action

MakerBay

Solar Energy Society of Hong Kong

Woodrite

Carbon Care Asia

Food Grace

Green Future Foundation

Greenpeace

Polar Research Institute of Hong Kong

The Conservancy Association

WWF-Hong Kong



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