



Hong Kong Institute of Qualified Environmental Professionals
香港合資格環保專業人員學會 (香港環專會)

To: Agriculture, Fisheries and Conservation Department

Attn: Secretariat of the Hong Kong Biodiversity Strategy and Action Plan

Dear Sir/Madam,

Response to the Public Consultation on “Updates to Hong Kong Biodiversity Strategy and Action Plan (BSAP)”

Thank you for inviting the Hong Kong Institute of Qualified Environmental Professionals (HKIQEP) to provide our views on the consultation document titled “Updates to Hong Kong Biodiversity Strategy and Action Plan (BSAP)”.

We welcome the Government’s commitment to strengthening biodiversity conservation and commend the proactive launch of this consultation to guide the strategic directions of Hong Kong’s BSAP in the coming years. HKIQEP supports the continued efforts to integrate biodiversity considerations into relevant sectors and encourages cross-boundary collaboration within the Greater Bay Area and beyond to address shared environmental challenges.

For your consideration, we have consolidated our detailed comments and suggestions in Annex 1, including general comments, specific comments and key recommendations, and responses to the guiding questions.

HKIQEP remains committed to supporting the Government’s efforts in biodiversity conservation. Should you have any questions or require further clarification, please feel free to contact us.

Yours sincerely,

Freeman Cheung

President

Hong Kong Institute of Qualified Environmental Professionals

Annex 1:

Comments on the Biodiversity Strategy and Action Plan (BSAP) 2.0

General Comments

The Hong Kong Institute of Qualified Environmental Professionals (HKIQEP) warmly welcomes and fully supports the proposed update and advancement of the city-wide Biodiversity Strategy and Action Plan (BSAP 2.0). This initiative represents a significant step in safeguarding Hong Kong's rich biodiversity, promoting sustainable development, and strengthening biodiversity mainstreaming across all sectors.

Globally, biodiversity is under growing threat from habitat destruction and degradation, pollution, overharvesting, biological invasions, and climate change. Addressing these issues requires a strong focus on preventing habitat degradation, reducing pollution, regulating exploitation, controlling invasive species, and promoting carbon neutrality.

Since the launch of the first BSAP in 2012, Hong Kong has made commendable progress. These include the designation of protected areas such as Robin's Nest Country Park, South Lantau Marine Park, and North Lantau Marine Park. Marine water quality has significantly improved under the Harbour Area Treatment Scheme (HATS), with reductions in *E. coli* (95%), ammoniacal nitrogen (50%), and increases in dissolved oxygen (12%). The trawl ban introduced in 2012 has led to a 26% reduction in suspended solids and improved marine biodiversity.

Key observations include:

Appreciation for the significant accomplishments outlined in the BSAP consultation document, including the designation of new protected areas.

Recognition of enhanced ecological corridors such as the blue (Deep Bay) and green (Hung Fa Leng–Wu Tong Shan) corridors between Hong Kong and Shenzhen.

Support for Hong Kong's endorsement of the Kunming-Montreal Global Biodiversity Framework (GBF), particularly its 23 global targets across three key areas: (i) reducing threats, (ii) sustainable use and benefit-sharing, and (iii) implementation and mainstreaming.

Encouragement drawn from the HKSAR Government's commitment to the China National BSAP 2023–2030.

Additionally, biodiversity considerations are increasingly integrated into Environmental Impact Assessment (EIA) practices and infrastructure planning. Public awareness has grown, supported by education campaigns, social media outreach, and the Hong Kong Biodiversity Hub. These achievements form a strong foundation for BSAP 2.0.

However, to fully realize BSAP 2.0's mission—conserving ecosystems, species, and genetic diversity while balancing socio-economic goals—continued effort, innovation, and collaboration are essential.

Specific Comments and Key Recommendations

Item 1: Mapping BSAP Themes to Global and National Targets

While the four strategic focus areas of BSAP 2.0 (Nature Conservation, Deepening Mainstreaming, Capacity Building, Collaborative Partnering) align with the 27 targets of China's National BSAP and the 23 targets of the Kunming-Montreal Global Biodiversity Framework (GBF), we recommend that the updated BSAP clearly map these areas to their corresponding global and national targets. This would improve transparency and help the public and stakeholders better understand how Hong Kong's actions support broader biodiversity goals.

Area 1: Nature Conservation

Item 2: Area-Based Conservation Measures

Comment:

The three proposed actions under Area 1 are generally supported. However, like the GBF, BSAP 2.0 would benefit from setting measurable targets. In particular:

The Deep Bay wetland system, of global ecological importance, continues to be degraded by both planned and unauthorised developments. The annual Deep Bay Waterfowl counts have recorded a sustained decline in the number of waterbirds.

Freshwater marshes are threatened by unauthorised development and aging of these semi-artificial ecosystems.

Secondary forests and Fung Shui Woods are valuable for both biodiversity and carbon storage. Their removal significantly impacts local ecosystems, and restoration is costly and uncertain.

Recommendation:

Conduct a comprehensive review of existing conservation legislation to ensure its relevance and effectiveness. Some designated restricted areas or Sites of Special Scientific Interest (SSSIs) may no longer fulfil their original purposes, while new ecologically valuable sites require formal designation.

Provide active management and sufficient resources for all protected areas.

Align with the global "30 by 30" target by designating at least 30% of Hong Kong's coastal waters as Marine Protected Areas (MPAs) and fisheries protection zones by 2030.

Explore adopting an "Ecological Red Line" policy, similar to Guangzhou's protection of all mangrove areas larger than one hectare.

Item 3: Wetland and Freshwater Habitat Protection

Comment:

To align with GBF Target 1 (Plan and Manage All Areas to Reduce Biodiversity Loss), BSAP 2.0 should commit to halting wetland loss or fragmentation in Deep Bay and other freshwater marshes across Hong Kong. These habitats require active management to maintain ecological functionality. Likewise, the protection of intact natural forests should be prioritized wherever possible.

Recommendation:

Introduce a “no net loss” policy for wetlands and freshwater marshes. Strengthen management through initiatives such as the Management Agreement Scheme.

Develop and implement an action plan for designating new protected areas, particularly marine protected areas, where Hong Kong currently falls short of GBF Target 3.

Item 4: Restoration and Revitalization Strategy

Comment:

We commend the Government’s intention to restore degraded habitats; however, BSAP 2.0 lacks clear strategies and restoration targets.

Recommendation:

Develop a comprehensive restoration strategy and action plan with measurable targets, covering coral communities, seagrass beds, freshwater marshes, streams and rivers, native forests, and Fung Shui Woods.

Area 2: Deepening Mainstreaming

Item 5: Development of a TNFD-Aligned Local Framework

Comment:

We support the adoption of the Taskforce on Nature-related Financial Disclosures (TNFD) framework. However, simply providing funding is not sufficient. A local reporting framework tailored to Hong Kong’s economic and institutional context is essential for effective implementation.

Recommendation:

The Government should lead the development of a localized TNFD-aligned reporting framework. Investment in research and multi-stakeholder engagement will be necessary to build credibility and facilitate widespread adoption.

Item 6: Guidelines for Nature-based Solutions (NbS)

Comment:

We support the promotion of NbS. However, due to Hong Kong’s compact urban environment, it is crucial to avoid misuse of the concept. Clear guidelines are needed to ensure effective and context-appropriate implementation.

Recommendation:

Commission local academic institutions to develop Hong Kong-specific NbS guidelines. While the Civil Engineering and Development Department (CEDD) is preparing NbS guidelines for the Northern Metropolis, equivalent guidance is needed for the rest of Hong Kong.

Item 7: Community Stewardship Mechanisms

Comment:

We support initiatives that encourage communities to take on stewardship roles and engage in biodiversity conservation. However, without structured mechanisms, community involvement may remain limited.

Recommendation:

Establish clear frameworks and support mechanisms under BSAP 2.0 to encourage active community participation and stewardship in biodiversity conservation.

Area 3: Capacity Building

Item 8: Integration into School Curricula

Comment:

The three proposed actions are well-conceived but lack sufficient detail for effective implementation.

Recommendation:

Collaborate with the Education Bureau to embed biodiversity education at all levels, from kindergarten through tertiary education. Focus on key topics such as ecological security and biodiversity protection.

Item 9: Legislative Updates for Species Protection

Comment:

Gaps remain in the legal framework. For example, Cap. 170 allows capturing non-protected wildlife by hand, leaving many species vulnerable.

Recommendation:

Revise outdated legislation to comprehensively protect all wildlife species.

Item 10: Sustainable Fisheries Management

Comment:

While the trawl ban has improved marine conditions, overfishing continues in southern waters.

Recommendation:

Introduce sustainable fishing quotas and update Cap. 171 to regulate gear types, fish size, and harvest limits.



Item 11: Ecosystem Restoration Expansion

Expand restoration programmes to include habitats beyond coral and seagrass. Address ecological threats such as the overpopulation of spiny urchins, which degrade marine ecosystems. Enhance wildfire education and prevention in country parks to safeguard flora and fauna.

Item 12: Species Action Plans

Comment:

We recognize the value of existing action plans for species such as the incense tree, green turtle, and Chinese pangolin. However, many other species remain unaddressed.

Recommendation:

Develop and implement new action plans for endangered and endemic species including Chinese white dolphins, otters, and others.

Item 13: Adoption of Enabling Technologies

Utilize cutting-edge tools such as environmental DNA (eDNA) to monitor biodiversity and assess restoration success.

Employ AI-enabled technologies, including drones and smart lamp posts, to enable real-time and long-term biodiversity monitoring.

Item 14: Expansion of Citizen Science Programmes

Scale up existing initiatives like Reef Check and BioBlitz to involve more schools, universities, and community groups in biodiversity monitoring and outreach.

Item 15: Biodiversity and ESG Integration

Form a multi-sector working group to incorporate biodiversity considerations into ESG (Environmental, Social, and Governance) reporting. Develop standardized metrics and methodologies for biodiversity valuation and carbon sequestration.

Item 16: Promoting Gender Balance

In line with GBF guidance, ensure gender diversity in advisory and governance committees. Set a minimum target (e.g., 35%) for female representation to foster inclusive decision-making.

Item 17: Establishment of a Natural History Museum

Advocate for the creation of a Natural History Museum or Biodiversity Centre, in collaboration with institutions such as the Hong Kong Jockey Club or Ocean Park.



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Item 18: Increased Financial Support for BSAP 2.0

Secure additional funding for BSAP 2.0 implementation, building upon the HK\$180 million allocated to BSAP 1.0.

Item 19: Wildlife Feeding Education and Enforcement

Strengthen public education campaigns and enforcement measures to reduce illegal wildlife feeding and its associated ecological impacts.

Item 20: Strategic Partnerships with Ocean Park

Leverage the conservation and educational capacities of Ocean Park to enhance public awareness, species protection, and habitat restoration under BSAP 2.0.

Responses to the guiding questions:

1) What is your vision for Hong Kong's nature conservation and biodiversity in the next 10 to 20 years? What concrete steps should we take to realise such vision?

- i. Vision: There should be no further loss of biodiversity in Hong Kong due to our own development activities.
- ii. To achieve this, the mitigation hierarchy of “Avoidance > Minimisation > Compensation” should be fully embraced. The principles of “Biodiversity Offset” should be implemented in Hong Kong.

2) Are there any additional challenges or opportunities for Hong Kong's biodiversity conservation that have not been addressed in this document?

The continued threats of both planned and unauthorized developments on important habitats in Hong Kong are real. There is room for improvement in addressing these challenging issues.

3) Other than the actions briefly outlined under the four strategic areas, what other measures should the Government consider to enhance biodiversity conservation and sustainable development?

Mainstreaming of biodiversity among government departments should not stop. An urban biodiversity strategy is needed for Hong Kong. Many cities worldwide have such a strategy for example, Singapore.

4) How can we better raise public awareness towards the importance of biodiversity and encourage broader support and participation in conservation efforts?

Mainstreaming biodiversity in formal school curricular is a good start. In addition, the ecotourism sector directly benefits from sustainable biodiversity, and participants often show greater support for conservation. Therefore, strengthening informal eco-education through ecotourism should also be considered.

5) How can we encourage different sectors to play a more active role in supporting biodiversity conservation and sustainable development?

The Government needs to be a driver. Setting up widely recognised framework or guidelines for the private sector are effective methods.

More incentives should be provided to encourage integrating biodiversity elements into private projects. These could include tangible benefits, such as increasing the weighting or credit points for buildings seeking BEAM Plus certification, or intangible rewards, like an annual Green Award to honor organizations with exceptional biodiversity contributions or performance.

6) What opportunities do you see for integrating NbS into Hong Kong's urban development?

The government should take the lead in developing urban biodiversity master plans for all districts of Hong Kong. This should lead to a review of the relevant chapters of the Hong Kong Planning Standards and Guidelines and the relevant OZPs in which planning for biodiversity could be initiated.

7) Which actions should Hong Kong take as a matter of priority in conserving biodiversity and natural resources? How can we effectively mobilise resources from different sectors to support these actions?

- i. Hong Kong should prevent further loss of important habitats to development. Planning for biodiversity is the key.
- ii. Secondly, enforcement against unauthorised development in threatening important habitats needs to be strengthened.
- iii. Many of the restoration work could be funded by the private sector as ESG or TNFD investments. For examples, reforestation of degraded hillsides in Hong Kong could be funded by the private sector and NGOs could play a key role on this. Government funding may not be necessary.
- iv. Although the Government Green Bond Framework includes “Nature Conservation/Biodiversity” as eligible category, use of proceeds had not been allocated to this category according to the Government Green Bond Report. It is recommended to allocate the proceeds to relevant projects which can demonstrate to the private sector and NGOs how green capitals can be mobilised to drive positive impacts on nature conservation and biodiversity.
- v. In May 2024, HKMA has published the Hong Kong Taxonomy for Sustainable Finance which has a strong focus on climate mitigation. According to the Green Bond Endorsed Projects Catalogue jointly announced by the People's Bank of China, the National Development and Reform Commission and the China Securities Regulatory Commission in April 2021, conservation and restoration of natural ecosystems are included under ecological protection and construction as eligible projects. It is recommended to collaborate with HKMA to include Nature conservation/Biodiversity related projects in the HK Taxonomy with clearly defined criteria for eligible projects to utilize green capitals to achieve the desired environmental outcomes.
- vi. The capital market expected a surge in blended finance in the coming years on nature and climate finance, particularly in Asia. It is structuring approach which de-risks impact investments by using capital from philanthropic or public funding to catalyze commercial investment towards high-impact projects. It is suggested to explore pilot projects together with Philanthropy or Charitable organizations to pioneer the adoption of blended finance model to conserve biodiversity and nature resources in Hong Kong.

8) How can Hong Kong better address the impacts of climate change on biodiversity, and what measures should be taken to enhance the resilience of our ecosystems?

Habitat restoration is important as it would increase the resilience of our ecosystem to climate change. Setting up more protected areas, restoring more degraded habitats and investing more in relevant research would all help to mitigate the climate change impact.

9) How can Hong Kong strengthen collaboration with other GBA cities and international partners to jointly address shared environmental challenges?

We need to support a culture of collaboration and allowing extension of the benefits of nature to a broader community including GBA. This should be done within a common framework of ecological civilization.

10) What innovative technologies could play a vital role in improving biodiversity monitoring and management in Hong Kong?

Information technologies could play key role in monitoring and managing biodiversity. WWHK and HKBWS are using IT in monitoring wildlife in Deep Bay. Future investment and research in that can connect biodiversity monitoring and management in Hong Kong would help. For example, the application of portable carbon dioxide sensor for the investigation of sink and source mechanism in targeted wetland areas.

Conclusion

The HKIQEP is committed to supporting the HKSAR Government's efforts in biodiversity conservation and sustainable development. We believe the proposed BSAP 2.0, with the incorporation of these recommendations, will serve as a robust framework to protect Hong Kong's biodiversity for generations to come. Together, let us build a resilient and ecologically rich Hong Kong.