



世界自然基金會
香港分會

WWF-Hong Kong

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The Honourable Mr John KC Lee, GBM, SBS, PDSM, PMSM
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Chief Executive's Office
Tamar, Hong Kong

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*By post and email to: ceo@ceo.gov.hk
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Dear Chief Executive,

WWF's response to 2025 Policy Address

WWF-Hong Kong (WWF) is pleased to see the Government's efforts over the past year in advancing biodiversity conservation, ecosystem protection, and positioning Hong Kong as a hub of energy transition. Notable initiatives include 1) the introduction of the green spine framework to enhance biodiversity in the Northern Metropolis, guided by Nature-based Solutions; 2) launching **"The Blueprint for the Sustainable Development of Agriculture and Fisheries"**¹ to advance the sustainability of Hong Kong as a nature-positive global city; 3) implementation of active wetland restoration, enhancement and long-term management at Sha Lo Tung and Long Valley by the Agriculture, Fisheries and Conservation Department; 4) consultation of experts' opinions through the Environmental Committee on ecological matters related to the Sham Po Shue Wetland Conservation Park; 5) the Civil Engineering and Development Department's planned rollout of a Nature-based Solutions guidebook by the end of this year; 6) cross-departmental collaboration among the Police Force, Customs and Excise Department, and the Agriculture, Fisheries and Conservation Department to combat illegal wildlife trade, and 7) continual execution and launch of relevant action plans and roadmaps in shaping Hong Kong as a green transport and logistic hub. These efforts reflect a positive and proactive approach to integrating ecological considerations into policy and enforcement.

¹ https://www.afcd.gov.hk/english/Blueprint/files/AFBlueprint_Eng.pdf

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Today, Chief Executive John Lee delivered his fourth Policy Address, highlighting economic transformation, innovation, and improving livelihood as the focuses for Hong Kong. WWF emphasizes that a healthy environment is vital to a thriving society, calling for policies to align sustainable development with biodiversity conservation.

The Chief Executive's 2025 Policy Address has made positive commitments which include strengthening ecological conservation and contributing to national and global biodiversity conservation, improving the quality of the marine ecological environment, restoration of coral communities and seagrass beds, advancement of Artificial Intelligence (AI) research that can be applied for conservation innovation. However, we are deeply concerned about the potential environmental and ecological impacts created by the overwhelming attention given to boosting Hong Kong's economic development without due consideration of biodiversity conservation.

WWF would like to respond to the 2025 Policy Address in the following environmental matters:

Biodiversity Conservation

Safeguarding Northern Metropolis Biodiversity Amid Planning Relaxations

WWF is concerned about the proposal to accelerate the development of the Northern Metropolis by streamlining administrative workflows, simplifying relevant statutory procedures and, relaxing or even removing existing barriers and restrictions. As the Mai Po and Inner Deep Bay Ramsar Site is embedded in the core of the Northern Metropolis, such relaxation could compromise the statutory protection mechanisms that have safeguarded the ecological integrity of the Deep Bay Wetlands over the years. While development is necessary for economic growth, it is crucial that we do not jeopardize the ecological balance of our natural assets. Careful consideration and robust environmental assessments must guide any relaxation of OZPs or alterations to development parameters to ensure that our ecosystems are protected for future generations.

Establish a Strategic Policy Framework for Sustainable Eco-tourism in Hong Kong

Recognizing that Hong Kong's countryside and biodiversity are assets that attract tourism, and that revenue from tourism can, in turn, support conservation. While the Government has been developing tourist hotspots, WWF urges a need for a policy framework for developing responsible and sustainable eco-tourism to ensure biodiversity and tourism are mutually beneficial. Within the framework, protection of biodiversity and natural habitats must be the primary goals, with local communities engaged in the planning process and receiving economic and social benefits. The Government should conduct science-based assessments to determine the ecological, environmental, and transport carrying capacities for all potential and even existing eco-tourism sites and use these findings to guide visitor management and infrastructure development. Tourism development in ecologically sensitive areas must also be avoided. A portion of tourism revenue

generated should be reinvested into the long-term protection, restoration, monitoring and research of these sites, ensuring the sustainability of these natural assets which are the foundation of eco-tourism.

Form a Strategic Policy Framework for Responsible Unmanned Aerial Vehicles (UAV) Operations

The low-altitude economy leverages UAV to integrate logistics, mobility, and communication networks. This emerging sector is poised to become a transformative economic force boosting societal growth. With such profound shift in our low-altitude airspace, there is a need to establish drone flying guidelines in the Action Plan on Developing Low-Altitude Economy to minimize recognized potential ecological risks, including the intrusion on ecologically sensitive areas, noise disturbance to wildlife, particularly on birds with direct risk of collision, and other animals with high auditory ability. The policy framework should regulate low-altitude drone activity through various measures for responsible drone use, particularly in the context of conservation. Regulations must be regularly reviewed to keep pace with technological advancements.

Oceans Conservation

WWF supports the Government's vision of contributing to building the Greater Bay Area (GBA) into an international first-class beautiful bay area. We recommend prioritizing the conservation of biodiversity hotspots in Mirs Bay and Port Shelter, achieved through active habitat restoration and fishery resource recovery.

Embedding Marine Gross Ecosystem Product (GEP) in Hong Kong's Marine Spatial Planning framework

Ecosystem services provided by Hong Kong's marine waters are vital to the city's economy, biodiversity, and public well-being. WWF commissioned the Chinese Academy of Sciences to pilot the GEP framework for seascape of the GBA. The results, presented in WWF's "**Valuing the Invaluable Blue**" report ², demonstrated the high ecosystem service value of the GBA's coastal waters and confirmed the feasibility of applying such framework in Hong Kong. By financially quantifying the contributions of marine ecosystems, the GEP framework provides a scientific, transparent, and policy-relevant basis for assessing trade-offs between development and conservation. WWF therefore recommends that the Government adopt this framework to guide ecosystem-based marine spatial planning, strengthen evidence-based decision-making on establishing Fishery Protection Areas and Other Effective Area-Based Conservation Measures (OECMs), and integrate ecological values into sustainable blue economy strategies.

² https://www.wwf.org.hk/ocean_invaluableblue_e

Promotion and Development of Artificial Intelligence (AI) for Sustainable Development

Strategic Investment in AI Research for Conservation Innovation

WWF supports the announcement of the \$3 billion Frontier Technology Research Support Scheme to attract top-tier researchers in AI and other frontier technologies to Hong Kong, providing a valuable opportunity to advance AI application in conservation and ensure effective protection of Hong Kong biodiversity. Complementing this, the \$1 billion earmarked for the establishment of the Hong Kong AI Research and Development Institute in 2026 could play a pivotal role in driving innovation for biodiversity protection and ecological resilience of city.

Anti-illegal Wildlife Trade

Strengthening Enforcement to Combat Illegal Live Animal Trade

WWF urges the Hong Kong government to take decisive actions to combat the recurring illegal trade of live animals by strengthening enforcement under the Wild Animals Protection Ordinance (Cap. 170). The current penalties are insufficient to deter poachers and traffickers, especially given the high market value of certain endangered species such as native freshwater turtles. Recent large-scale seizures—ranging from shipments of turtles and lizards smuggled from the United States and Australia into Hong Kong, to cases of native species trafficked across the border into mainland China—underscore the transboundary nature and growing scale of this illicit trade. Increasing penalties under Cap. 170 would send a strong message that Hong Kong is committed to protecting biodiversity and fulfilling its international obligations under CITES.

In parallel, WWF calls for a comprehensive review and update of Schedule 2 of Cap. 170, which lists protected wild animals. This schedule has remained largely unchanged since the ordinance's enactment in 1976, and no longer reflects the current conservation status and challenges of many species. The review should be informed by the latest scientific assessments, including at-risk species listed in “**The State of Hong Kong Biodiversity 2025**”³, and globally threatened marine species such as seahorses and horseshoe crabs. An updated and evidence-based list of protected species is essential to ensure that enforcement efforts are targeted, effective, and responsive to emerging threats.

Environmental Education

Mainstreaming Nature-based Education (NbE) in the School Sector

WWF urges the Government to mainstream Nature-based Education (NbE) through a coherent curriculum framework that embeds environmental and

³ <https://www.wwf.org.hk/en/biodiversity/hkbiodiversity2025/>

sustainability themes across all subjects and schooling levels. Currently, environmental education remains fragmented, limiting its impact on student learning and school culture. The framework must promote action-oriented learning that empowers students to apply knowledge in real-world contexts and cultivate environmental responsibility. WWF recommends mandatory annual outdoor learning experiences for all primary and secondary school students, supported by a Government-led certification system for outdoor learning centers and agencies to ensure safety, educational value, and environmental integrity. To build teacher capacity, NbE should be a core component of Continuous Professional Development, with targeted training in biodiversity and conservation. The introduction of Primary Science and Humanities in primary education presents a timely opportunity to integrate NbE meaningfully.

Thank you for your consideration. We look forward to working with your colleagues on the above recommendations.

Yours sincerely,

WWF-Hong Kong