



世界自然基金會  
香港分會

WWF-Hong Kong

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The Honorable Mr. Paul Chan, GBM, GBS, MH, JP  
Financial Secretary  
The Government of the Hong Kong Special Administrative Region  
25/F, Central Government Offices  
2 Tim Mei Avenue, Tamar, Hong Kong

22 January 2025

Dear Mr. Chan,

### Response to 2026-2027 Budget Consultation

In a recent public consultation, esteemed Financial Secretary called for Hong Kong to leverage the '15th Five Year Plan' to pursue high-quality development. WWF Hong Kong emphasises it is equally crucial to elevate nature conservation to a higher level by creating conditions in which economic prosperity and biodiversity conservation advance hand in hand. This advancement of ecological civilisation has been stipulated in the "15th Five-Year Plan" so that our country can attain the vision of a Beautiful China with our population leading healthy living.

We are also thrilled to read the updated Hong Kong Biodiversity Strategy and Action Plan (BSAP) released at the end of 2025, in which the Government has outlined a 10-year blueprint to make Hong Kong a model of a vibrant, liveable and sustainable international metropolis. Regarding the public consultation for the 2026–2027 Budget, WWF respectfully submit the following recommendations with the aim of strengthening Hong Kong's biodiversity conservation efforts while simultaneously identifying opportunities to generate new revenue streams and alleviate fiscal pressures on the Government. Our recommendations align with some of the key elements of the updated BSAP, such as Nature-based Solutions, the "One Health" whole-of-society approach, sustainable eco-tourism, smart environmental solutions, and private land conservation.

**together possible**™

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## **Implementing the updated Hong Kong Biodiversity Strategy and Action Plan (BSAP)**

WWF welcomes the promulgation of the updated Hong Kong BSAP, paving the way for safeguarding nature and biodiversity across the city over the next decade. The BSAP listed an impressive number of priority actions and projects; these significant steps, if implemented successfully, would lead Hong Kong to achieve important global, national and local climate and conservation milestone. The Government must allocate sufficient funding and manpower for the key implementing bodies, particularly the Agriculture, Fisheries and Conservation Department and the Inter-departmental Working Group on BSAP (IWGB), to ensure effective delivery of the 30 priority actions and 81 priority projects which demand adequate resources.

## **Conserving Private Ecologically Important Sites with Minimised Government Expenditure**

WWF's latest report, "**The State of Hong Kong Biodiversity 2025**"<sup>1</sup>, and the BSAP highlight a critical issue: many of the city's most biodiverse and ecologically sensitive areas lie outside the Country Parks, often on private land, and face imminent development threats. Since the 2004 New Nature Conservation Policy, Management Agreements (MA) and Public-Private Partnerships (PPP) have been the key tools to protect ecologically important private sites. Yet, over two decades later, most of such sites remain unprotected with ongoing degradation to the detriment of our biodiversity. To tackle this long-standing challenge, the Government should strengthen and expand MA and PPP schemes while introducing innovative tools like conservation easements and land trusts which are effective conservation tools allowing the Government to secure long-term protection of private land without purchasing the land outright, and the landowner is able to retain land ownership while donating the permanent rights to manage the land to a qualified Non-Governmental Organizations. Successful cases, such as Lai Chi Wo, illustrate that effective conservation and rural revitalisation of private lands can deliver strong ecological outcomes alongside tourism opportunities.

## **Strengthening Sustainable Eco-Tourism to Boost Government's Revenue**

The 2025 Policy Address envisions concepts like "Beautiful Bay Area" and "Yacht tourism", while the BSAP further highlights sustainable ecotourism as a key opportunity

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<sup>1</sup> <https://www.wwf.org.hk/en/biodiversity/hkbiodiversity2025/>

to balance conservation and development. If properly designed and managed, sustainable ecotourism can generate government revenue by attracting nature visitors who are willing to spend more on distinctive, eco-friendly experiences. Revenue can be enhanced through targeted taxes—similar to Bhutan's daily fee—reinvested in upkeep of tourism infrastructure, as well as preserving our nature and cultural heritage. This approach also stimulates local economies by creating jobs and supporting small businesses, expanding the tax base and driving long-term economic resilience, while reinforcing Hong Kong's leadership in biodiversity conservation and shaping a world-class, environmentally responsible Greater Bay Area.

### **Supporting Smart Environmental Solutions to Digitalise Biodiversity Conservation While Creating New Revenue Streams**

The Government should establish a “Smart Environmental Solutions Trial Scheme for Public Sector” under the Innovation and Technology Fund that supports development and deployment of AI-powered tools, automated robots and systems, and remote sensing to monitor biodiversity, wildlife habitats, as well as eco-vandalism in real time. Predictive analytics can forecast biodiversity and climate risks, enabling proactive and adaptive management of ecologically sensitive areas. This approach reduces enforcement costs, enhances ecological protection, and generates high quality environmental data that can be monetised through partnerships with research institutions and Environmental, Social and Governance (ESG) reporting services. Verified biodiversity metrics will also attract green finance and carbon credit investments.

### **Investing Nature-based Solutions (NbS) for Public Expenditure Reduction**

The Civil Engineering and Development Department is publishing a NbS guidebook for the Northern Metropolis developments, while Agriculture, Fisheries and Conservation Department is advancing citywide integration of NbS and wildlife-friendly designs; these efforts signal a positive step toward a more resilient, biodiverse, and nature-positive Hong Kong.

NbS can significantly save Government's capital works expenditure by offering cost-effective ways to manage climate risks, mitigate disaster impacts and reduce the need for costly infrastructural repairs while boosting green jobs and recreation opportunities, improving public health and wellbeing, enhancing infrastructure resilience, and often minimising capital investment and expenditure compare with traditional engineering solutions. Take WWF's submission on San Tin Technopole's Outline Zoning Plan as an example, we demonstrated that four typical Deep Bay fishponds, each one hectare in

area, would provide the same storage capacity of the underground storage tank in Happy Valley, which cost over a billion dollars to build. NbS should be led by the Government and be adopted across all planned and committed infrastructure/civil engineering works, building works or projects in Hong Kong, with particular emphasis on the Northern Metropolis.

### **Averting Pandemics through “One Health”**

“One Health” highlights the interconnection between humans, animals and ecosystems and fosters interdisciplinary collaboration to develop strategies for zoonotic disease prevention, which significantly save Government’s public healthcare expenditure by preventing costly disease outbreaks and addressing root causes of health issues that naturally transmitted across human, animal, and environmental sectors. Successful integration in health, agriculture, and environment leads to substantial fiscal savings in avoiding massive pandemic response expenses and economic disruption. We encourage the establishment of a One Health Taskforce with representatives from relevant departments, academic institutions, Non-Governmental Organizations, and professional associations, which will promote the One Health approach to and lead implementation of the One Health joint plan of action (2022–2026), as well as coordinating with the Central Government on health challenges at the human-animal-plant-environment interface.

Thank you very much for your kind attention and consideration.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Dan Bradshaw".

Dan Bradshaw  
Chairman  
WWF-Hong Kong