WWF-Hong Kong
2022-23 Policy Address Recommendation:
A Holistic Nature Conservation Policy for Sustainable Development
Executive Summary

WWF-Hong Kong’s first policy address recommendation for Chief Executive John Lee highlights the importance of setting up a “Holistic Nature Conservation Policy” bringing together conservation and development, rather than treating them as competing goals. This policy aligns with “President Xi Jinping’s Thought on Ecological Civilization”, China’s 14th Five-Year Plan, Greater Bay Area Policy Areas, and the current draft of the Post-2020 Global Biodiversity Framework. By adopting such a policy, Hong Kong can be a Green Development Paradigm, have a positive contribution to the nation’s global advocacy of building a well-connected community of all life on Earth, and thereby contribute to the revised targets of the Convention of Biological Diversity that are intended to reverse biodiversity loss.

Hong Kong is blessed with beautiful natural coastlines, with beaches and wetlands that transition into mountain ranges that are clothed by regenerating forests. Most importantly, almost 40% of the non-marine landscape comprises protected areas. These natural spaces provide ecosystem goods and services, such as clean air, clean water, food, and medicines, that our lives rely on.

Studies have also shown that nature or green space is essential for the well-being of people who spend most of their time in built-up areas. Access to nature improves sleep, increases happiness, promotes positive social interactions and even helps to generate a sense of meaning to life. Healthy, happy people contribute to economic productivity and, eventually, to a flourishing economy and a stable governance.

Hong Kong’s nature and its ecosystem goods and services is one of the city’s biggest uniqueness. We must treasure and conserve our nature, so that we can sustain our development for generations to come. To do so, WWF suggests bringing together conservation and development, as part of sustainable development, with the below vision and goal:

**Vision: People living in harmony with nature.**

**Goal: By 2030, a people- and nature-positive Hong Kong by transforming our relationship with nature.**

To achieve such a vision and goal for Hong Kong, our Chief Executive needs to mainstream conservation, and ensure environmental consideration is at the core of all ongoing and future developments. He must implement a comprehensive, ambitious, and practical plan, based on a holistic conservation policy shaped with support received from various bureaus and departments.

Here, we suggest five key, achievable and actionable recommendations to develop a policy that will support a vision for Hong Kong where people live in harmony with nature.

**Key conservation recommendations for a Hong Kong based on the Ecological Civilization concept of development:**

1. ** Beautify urban spaces and conserve natural spaces through comprehensive spatial planning.**

2. ** Become a net-zero carbon city with a green finance hub.**

3. ** Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health.**

4. **Strengthen marine biodiversity.**

5. ** Transition to a circular economy.**
Details of Key Policy Recommendations

1. **Beautify urban spaces and conserve natural spaces through comprehensive spatial planning**

Bringing together biodiversity conservation and development is key to a holistic conservation policy. The Ecological Civilization concept highlights the importance of using a systematic landscape governance concept to enhance ecosystem integrity, managing ecosystems effectively, and avoiding their disturbance or degradation by humans. President Xi Jinping said: "It is necessary to coordinate a systematic governance of the landscape, forest, farmland, lake, grass and sand systems, implement ecological protection and restoration projects, enhance the protection, and improve the stability and sustainability of the ecosystem." The first draft of the Post-2020 Global Biodiversity Framework also stated an action-oriented target to “ensure that all land and sea areas globally are under integrated biodiversity-inclusive spatial planning addressing land- and sea-use change, retaining existing intact and wilderness areas.”

To put the landscape governance concept in practice, WWF recommends the government to carry out comprehensive ecosystem-based spatial planning urgently prior to any new development. We propose the following specific measures should be adopted by the government:

A. Safeguard the integrity of Deep Bay ecosystems for their conservation values and as nature-based solutions to build climate resilience and contribute towards climate mitigation. This will include creating a wetland landscape along the Deep Bay coast, echoing the Northern Metropolis Development Strategy by:
   a. establishing a sustainable Northern Metropolis Office to kick-start consultation and stakeholder engagement to ensure a smooth and harmonised whole-of government planning and implementation process;
   b. extending the current Mai Po Inner Deep Bay Ramsar Site to include the three proposed Wetland Conservation Parks, Hong Kong Wetland Park and its extension, the Tsim Bei Tsui/Lau Fau Shan/Pak Nai Coastal Protection Park and Waterfront Promenade, and Long Valley Nature Park;
   c. restoring the fishponds in Lut Chau, Nam Sang Wai, Fung Lok Wai, and Tsim Bei Tsui into gei wai, to adopt an integrated management strategy for both biodiversity and fisher livelihoods;
   d. embracing a Smart City design and integrating green infrastructure into the Northern Metropolis under the sponge city concept and to qualify for Ramsar Wetland City status.

B. Publish, at regular intervals, a biodiversity indicator report for Hong Kong that sets out evidence of any gains or losses in populations or species of conservation concern, and which highlights the associated obligations and responsibilities of Hong Kongers under international covenants (such as the Convention on International Trade in Endangered Species of Wild Fauna and Flora and the Ramsar Convention).

C. Update The Hong Kong Planning Standards and Guidelines to ensure climate change and biodiversity conservation elements, such as climate mitigation and adaptation, ecological integrity, and habitat connectivity, are considered during planning process.

D. Apply a ‘no further conversion of wetlands’ policy to safeguard the ecological integrity of Hong Kong’s wetlands that are essential to safeguard the coastal areas from climate change impacts.
E. Establish a regulated Land Trust to provide feasible alternatives for landowners, such as land swaps, to resolve the current land rights deadlock on wetland use and management.

F. Include all land under statutory land use planning requirements with Development Permission Area Plans, and regulate land uses under Outline Zoning Plans.

G. Formulate and adopt holistic, long-term land- and marine-scape “Ridge to Reef” conservation plans to protect ecologically important habitats in South Lantau watersheds and the Inner Deep Bay.

H. Formalize the procedures for conducting Strategic Environmental Assessments to incorporate principles of the Convention on Biological Diversity (CBD), including no net loss, precautionary principles, wide stakeholder participation, and incorporating traditional and scientific knowledge.

I. Institutionalize an inclusive, transparent, and participatory integrated, multi-sectoral spatial planning process for landscapes and seascapes within the Planning Department to clearly demarcate land-use, including conservation areas.

J. Establish a Marine Spatial Planning authority and allocate adequate funding to kick-start the first stage of marine spatial planning.

K. Initiate an ecosystem-based marine spatial planning process that engages all relevant stakeholders.

2. Become a net-zero carbon city and a green finance hub

Together with biodiversity loss, climate change is threatening our well-being. The Hong Kong Observatory’s data has shown an increasing trend of extreme weather events. Every year, we experience unusual weather patterns, heavier rainfall and hotter days and nights, which will manifest as super-typhoons that will occur with greater frequency. The government must lead the way and address these intertwined issues to ensure Hong Kong will be a liveable city that is resilience to the impacts of climate change. Hong Kong’s role as an international financial centre provides us with opportunities to mitigate climate actions and conserve biodiversity through financial means.

Nature-based solutions such as green infrastructure offer a highly effective means to increase resilience to climate change and to reverse the attenuation of biodiversity, and we should take the opportunity to make use of existing opportunities with the utmost urgency. Nature-based solutions must be inclusive, transparent, developed with respect to local people’s views and traditional knowledge; the benefits generated should be equally distributed among stakeholders.

We reiterate that both biodiversity values and climate impacts must be integrated into policies, regulations, planning, development processes, accounts, and assessments of


environmental impacts at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows (public and private) are aligned with biodiversity values and climate impacts.

WWF Hong Kong proposes the following be adopted by the government as a matter of climate urgency:

A. Adopt existing or develop an effective and credible taxonomy to strengthen Hong Kong’s reputation as a leading green finance market.

B. Fully integrate and mandate biodiversity values and climate impact in policies, regulations, planning, development processes, accounts, and assessments at all levels and portfolios of government and across all sectors of the economy.

C. Establish a Climate Action Authority to ensure the mainstreaming of climate action.

D. Study the worst-case scenario under SSP5-8.5 sea level rise\(^4\) and storm surge during extreme weather events and ensure all future developments are safe from impact of climate change.

E. Mainstream nature-based solutions such as green infrastructure in urban planning to mitigate urban heat island effects protect coastal areas, reduce floods droughts and other natural disasters from extreme weather events, while benefiting biodiversity conservation.

F. Set an ambitious target and roadmap for the government itself to reach carbon neutral before 2030.

G. Disclose government energy use and carbon reduction data by department to set a good role model for the society to follow.

H. Set a government internal low carbon procurement policy to foster and encourage market change to low carbon products.

I. Allocate resources to facilitate school private light bus as the next sector to go for electrification.

J. Raise the bar of the existing climate change and decarbonization plan, with target-setting grounded in science-based approaches that align with the mid-century 1.5°C net zero pathway.

K. Meet a minimum 10% renewable energy (RE) target by 2030, with integration of biodiversity protection during whole development process, from early planning, design, construction, operation and decommission.

L. Diversify Hong Kong’s RE portfolio through regional collaboration, with application of certified sustainably sourced biofuel to abate “international emissions” from the aviation sector.

M. Establish a dedicated funding facility for sustainable development, and in particular for climate change mitigation and biodiversity conservation and restoration.

3. Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health

To reverse biodiversity loss, it is necessary to address the causes and drivers of such loss, including unsustainable consumption and trade of wildlife. A milestone to halve the footprint of production and consumption by 2030 and targets covering all drivers, including food systems, diets and infrastructure, is needed.

In July 2022, the government released the Hong Kong Money Laundering and Terrorist Financing Risk Assessment Report. The report is a wakeup call not only to the government, but also to the private sector to fight transnational organized wildlife crime, recognized as a USD $200 billion-a-year illegal industry. Throughout 2015-2020, a total of 2,817 seizures were made involving 2,214 metric tonnes of wildlife conservatively valued at HK$723 million. 1,824 people were arrested and 871 convicted.

With the number of seizures, suspected black market value, and arrests, WWF encourages all parties to increase reporting and investigations and to utilize the enhanced investigative and punitive powers of Cap 455 or Organized and Serious Crimes Ordinance (OSCO) amended in August 2021 that now includes offenses under Cap 586. Under Cap. 455, an “authorized officer” does not include staff of Agriculture, Fisheries and Conservation Department (AFCD). With a specialized team operating under the Inter-Departmental Task Force on Wildlife Crime, in determining and investigation of IWT offenses associated with OSCO, the government will fully utilise its anti-money laundering powers in identifying kingpins and illicit financial flows associated with wildlife crime.

The spread of Covid-19 in Hong Kong and across the world and the recent transmission of the virus from hamsters to humans in Hong Kong demonstrates the risk and need for stricter regulations of the exotic pet trade to prevent future zoonotic disease outbreaks.

The government must ensure that the direct and indirect harvesting, trade and use of wild species is sustainable, legal, and safe for human health, including by applying the ecosystem approach to fisheries, and urgently take actions to stop the supply and sale of illegal wildlife products. WWF urges the government to:

A. Create a Specialized Team led by the Customs and Excise Department and Hong Kong Police Force within the Inter-Departmental Task Force on Wildlife Crime, to lead investigation into Organized and Serious Crime, including the determination that a case involves such elements and needs to be investigated and prosecuted as such.

B. Designate an independent Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Scientific Authority in Hong Kong to help mitigate issues relating to illegal captive breeding, wildlife trafficking, and inadequate traceability of traded species. It would operate in a complementary and supporting role to the activities currently undertaken by the CITES Management Authority, AFCD.

C. Strengthen the traceability, regulation, monitoring, and enforcement of Hong Kong’s exotic pet trade markets, with priority on parrots and tortoises.

D. Establish a seafood labelling system to provide transparent information on i) source country, ii) production method and iii) scientific names on pre-packaged seafood products.

E. Encourage inclusion of biofiltration/ filter systems in all mariculture farms.

F. Strengthen regulatory protection for marine animals, such as the whale shark (Rhincodon typus), Chinese Bahaba (Bahaba taipingensis) and the two species of
horseshoe crab (*Tachypleus tridentatus* and *Carcinoscorpius rotundicauda*) found in Hong Kong.

G. Urgently strengthen measures to eradicate illegal fishing, including stronger collaboration between government agencies, cross-boundary collaboration with Guangdong authorities, and strengthening penalties and awareness of enforcement agencies and judiciary.

H. Enhance fisheries management, including developing an AIS system to monitor fishing activities within Hong Kong and across the boundary, provide monetary rewards to whistle-blowers of illegal fishing, and establish a user-friendly reporting system facilitating voluntary whistleblowing.

4. **Strengthen marine biodiversity**

Marine Protected Areas (MPAs) can provide significant socio-economic benefits during the post-COVID green recovery period from outdoor recreation, eco-tourism, scuba-diving, and better-regulated fisheries. We urge the government to take a proactive and precautionary approach and commit to a specific and time bound roadmap for increasing coverage of effectively managed MPAs to 30% of Hong Kong waters by 2030, which aligns with the CBD target.

Currently, 5% of Hong Kong’s waters are designated or planned to be established as MPAs by 2023. Most are compensation for developments. This extent falls short of Hong Kong’s commitments to the CBD, and to conserve Hong Kong’s representative marine biodiversity. President Xi Jinping’s Ecological Civilization also emphasised to strengthen ocean conservation and governance, and to build a coastal ecological belt within the Greater Bay Area.

The MPA network should be based on a science-based planning exercise that includes strict no-take reserves, Fisheries Protection Areas (FPAs), species-specific conservation zones, community-based fisheries reserves, and other MPA designations. The establishment of FPAs should be accelerated with transparency. The government should review the establishment schedule and provide progress updates regularly. Under the proposed Holistic Nature Conservation Policy, an all-round management plan must be implemented in all MPAs and proposed FPAs to conserve and restore the ecosystems through appropriate zoning and use practices, from strict no-take zones to enforcing sustainable fishery practices.

To prevent the extirpation of the Pearl River Delta population of Chinese white dolphins (*CWD; Sousa chinensis*), the Hong Kong government must work closely with the Guangdong authorities to activate timely conservation actions. Governments can refer to the *Emergency Action Plan for Chinese White Dolphins*[^6], formulated jointly by authorities, academics, conservationists and specialists from Hong Kong and the broader Greater Bay Area for developing a regional management plan to preserve key habitats and mitigate


major human impacts. Key actions include establishment of buffer areas connecting key dolphin habitats and re-routing major shipping lanes away from critical habitats.

To restore and safeguard marine heritage, WWF advocates the following actions from the government:

A. Establish and commit to, by 2023, a roadmap for MPAs to cover 30% of Hong Kong waters by 2030, with effective site-specific management plans and time bound conservation goals.

B. Withdraw the Central Waters Reclamation plan under Lantau Tomorrow due to the potential unavoidable negative impact on local cetaceans, coral communities and fishery. Ever worse, the plan may expand hypoxia waters in Hong Kong, which is catastrophic to both the living standard of Hong Kong resident and the marine biodiversity.

C. Establish a development-free Dolphin Conservation Management Area off western and southern Lantau by 2024, by expanding the Southwest Lantau Marine Park to also cover coastal waters off Tai O and Lo Kei Wan, and natural continuous coastline of western Lantau supporting abundant prey supply to CWDs.

D. Update the Environmental Impact Assessment Ordinance (EIAO) to provide specific guidelines for assessing, evaluating, and mitigating underwater noise impacts, with mandating acoustic propagation modelling.

E. Establish, by 2025, a Shui Hau Marine Protected Area, with zoning that provides strict protection to the most ecologically sensitive area and allows regulated activities in the outer zone.

F. Establish a Ninepins MPA by 2026 to drive socio-economic benefits, enhance climate resilience and facilitate fisheries resources recovery.

G. Accelerate the designation of the FPAs, with the aim of recovering depleted fish stocks to sustain fisher livelihoods.

H. Update the Marine Parks and Marine Reserves Regulation (Cap.476A) to implement sites-specific measures within designated marine parks, with setting SMART goals as quantitative indicators of protect area effectiveness.

I. Expedite cross-boundary management of protected areas throughout the Greater Bay Area.

5. Transition to a circular economy

Plastic pollution is affecting people’s well-being. Plastics are ubiquitous worldwide and now found in all kinds of organisms, including in humans. Recent studies have found microplastics in human blood circulatory systems and lungs with irreversible effects to human health. The first draft of the Post-2020 Global Biodiversity Framework target 7 is about “eliminating the discharge of plastic waste”. Ecological Civilization states the

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importance of high quality development and a circular economy to use the least amount of resources to create the biggest social-economic value.

City and coastline full of plastic pollution shouldn’t be a scene of a green city paradigm. If our government has pledged to make Hong Kong a liveable and beautiful city, a circular plastic economy is urgently needed, where materials are recycled and reused, resources are responsibly managed, and negative impacts are actively avoided. A plastic circular economy can reduce the amount of plastic that leaks to both urban and natural environments.

To reach the goal of No Plastic in Nature by 2030, a holistic waste management system with bold, legally binding instruments is needed to tackle the problem and make Hong Kong a plastic-smart city. In dealing with the plastic problem, we highly recommend the government to adopt the “CATCH” principle (i.e., circular, adaptive, transparent, convenient, and holistic), which was proposed during the Producer Responsibility Scheme on Plastic Beverage Containers previously\(^{10}\), to ensure all future schemes can truly solve the plastic pollution problem by engaging civil society.

Currently, we lack the policies and measures to stimulate the demand and supply for products and services that come from a circular economy. Therefore, WWF suggests the following actions from the government:

A. Accelerate the ban legislation process for single-use plastic cutlery and polystyrene tableware by 2023, and phase out other single-use plastic and biodegradable tableware for both dine-in and takeaway services by 2025, including individual packaging for tableware items.

B. Establish an aid fund for the F&B industry to roll out incentive schemes to encourage customers to bring their own tableware for takeaway orders.

C. Set a high levy on single-use shopping bags of any material, with minimal exemptions, by 2022.

D. Expand the Plastic Recycling Pilot Scheme to all districts and release the most up-to-date recycling rates of plastics on a monthly or quarterly basis.

E. Adopt a comprehensive Producer Responsibility Scheme for Plastic Beverage Containers by 2023, with a goal to reach 100% bottle-to-bottle recycling by 2030.

F. Develop clear standards and guidelines for modified plastics (i.e., biodegradable and compostable plastics) and restrict those are not compatible to Hong Kong market (either cannot be biodegraded, composted, or cannot be recycled).

G. Push forward a labelling system to facilitate appropriate end-of-life treatments for plastics and boost the recycling rate of plastics.

|------------------------------------|-------------------------------------------------|-------------------------------------------------|-------------------------------------------------|-------------------------------------------------|---------------------------------|
| Beautify urban spaces and conserve natural spaces through comprehensive spatial planning. | 15, 16, 24, 31, 40, 42, 51, 55, 56, 57, 60, 61, 62, 63, 64, 65, 67, 82 | 9-33-2, 11-37-1, 11-37-2, 11-37-3, 11-38-5. | • To vigorously take forward ecological conservation, establish the approach of green development.  
• To strengthen the protection and enhancement of wetlands.  
• To enhance the protection of green mountain and blue bay, establish ecological protection barriers for forest ecology and marine ecological belt. | Target 1, Target 21. | • Biodiversity indicator report is released by an NGO on a bi-yearly basis. |
• To nurture and develop industries such as new energy, energy conservation and environmental protection, and new energy vehicles, and form a belt of industry aggregation with R&D of energy conservation and environmental protection technologies as well as the development of headquarters and bases as its core. | Target 8, Target 14, Target 15. | • Climate Action Plan 2050 was launched in 2021.  
• Green & Sustainable Finance Cross-Agency Steering Group was established in May 2020, co-chaired by the Hong Kong Monetary Authority and the Securities and Futures Commission.  
• Centre for Green & Sustainable Finance was launched by the Green & Sustainable Finance Cross-Agency Steering Group in July 2021. |
| Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health. | 24, 62, 64, 69, 75, 82 | 9-33-1, 11-37-3, 11-38-5. | • To put into practice ideas on ecological conservation, make full use of modern information technology, and build a beautiful bay area that is ecologically safe. | Target 5. | • Organized and Serious Crimes Ordinance (OSCO) amended in August 2021 that now includes offenses under Cap 586. |

[^12]: [http://www.xinhuanet.com/fortune/2021-03/13/c_1127205564.htm](http://www.xinhuanet.com/fortune/2021-03/13/c_1127205564.htm)  
[^14]: [https://www.cbd.int/doc/c/abb5/591f/2e46096d3f0330b08ce87a45/wg2020-03-03-en.pdf](https://www.cbd.int/doc/c/abb5/591f/2e46096d3f0330b08ce87a45/wg2020-03-03-en.pdf)
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<th>President Xi Jinping's Thought on Ecological Civilization(^{11}) (Point)</th>
<th>China’s 14th Five-Year Plan(^{12}) (Part – Article – Session)</th>
<th>Greater Bay Area Environmental Protection and Sustainable Development Policy Areas(^{13}) (Direct quote from “Development Focus”)</th>
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<td>Strengthen marine biodiversity.</td>
<td>President Xi Jinping’s Thought on Ecological Civilization(^{11}) (Point)</td>
<td>24, 30, 51, 58, 59, 64, 67, 82</td>
<td>9-33-2, 11-37-1, 11-37-2.</td>
<td>A pleasant ecological environment should essentially be formed under the framework for an international first-class bay area. • To step up cooperation in ecological and environmental protection among Guangdong, Hong Kong and Macao, and enhance ecological and environmental systems in a concerted manner. • Establishing ecological protection barriers. • Establish marine ecological belt. • To enhance the conservation of marine resources and environment.</td>
<td>Target 3.</td>
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<td>Transition to a circular economy.</td>
<td>13, 30, 31, 43, 51, 69, 82</td>
<td>11-38-2, 11-39-2.</td>
<td>On cleaner production, to enhance promotion of cleaner production technologies and practices.</td>
<td>Target 7.</td>
<td>Rolled out 2 stages of pilot of Reverse Vending Machine scheme to collect recyclable beverage containers, but bottles being collected have yet to be turned to new rPET bottles. • Plastic bag levy has remained $0.5 for almost 10 years. WWF carried out a survey with FTU on the views of increasing the levy, with 80% participants claiming they would not request a bag if the fee increases to $2.</td>
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