WWF-Hong Kong's Recommendations for 2025 Policy Address
August 2025

WWF-Hong Kong would like to make recommendations on nature conservation, green energy and education with 7 major focuses; they are: (1) Navigating Economic Challenges and Climate Impacts for Nature Conservation; (2) Adopting a Holistic Strategy for a Sustainable Marine Environment; (3) Leveraging Wetland Ecosystem Services for a Liveable Hong Kong ; (4) Tackling Wildlife Crime with Enhanced Regulations and Emerging Technologies; (5) Leading Greener Energy Transition for a Regional Energy Paradigm Shift; (6) Elevating Innovation and Technology in Nature Conservation; and (7) Mainstreaming and Curriculum Integration of Nature-Based Education in the School Sector. These focuses are elaborated as follows.

1. Navigating Economic Challenges and Climate Impacts for Nature Conservation

1.1 Levelling up biodiversity as a strategic focus on par with the intertwined climate change

The interconnectedness of the climate and biodiversity crises is well recognised because climate change alters ecosystems and ecological processes, leads to change in species composition and population; conversely, biodiversity loss weakens ecosystems' ability to regulate climate and extreme weather events, exacerbating climate change impact. While the Government strengthened our knowledge on climate change impacts on biodiversity in the first BSAP (Action 19a refers)[1], the interdependence of the two crises was not fully explained, and solutions for these challenges were not technically addressed. Climate change is a major cause of biodiversity loss[2]; it is imperative for the Government to recognize that biodiversity and climate change are intricately linked, and to understand how efforts to address one inevitably impact the other. WWF recommends the Government to elevate the existing Commissioner for Climate Change or create a new climate-biodiversity commissioner as an independent statutory officeholder that acknowledges the dual crisis and to develop urgent actions on climate change, biodiversity conservation, and ecosystem restoration, and to coordinate the amendment and/or formulation of related policies.

1.2 Developing a strategic eco-tourism framework to safeguard biodiversity and maximize conservation outcomes

In 2024, the government actively promoted the concept of "tourism is everywhere in Hong Kong," under the "**Tourism Blueprint 2.0**"[3] which also includes the development of ecotourism. This initiative, however, has led to localized over-tourism such as at High Island Reservoir, highlighting the inherent conflict between tourism development and preservation of natural assets. If planned and managed well, biodiversity and tourism could be mutually beneficial. Biodiversity often attracts tourists, and tourism revenue can support conservation efforts.

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[1] Environment Bureau (2016) Hong Kong Biodiversity Strategy Action Plan 2016-2021. Hong Kong, the Government of the Hong Kong Special Administrative Region p.73.
[2] https://www.engain.com/the-twin-threat-biodiversity-and-climate-change/
[3] https://www.cstb.gov.hk/file_manager/en/documents/consultation-and-publications/Tourism_Blueprint_2.0_English.pdf

WWF advocates the Government to develop a well-defined, responsible and appropriate strategic framework for eco-tourism. Such framework should deepen tourists' and the public's enjoyment and appreciation of Hong Kong's biodiversity and natural environment, while promotes sustainable development in rural areas for the benefits of both the local communities and nature. The framework should set out guiding principles to identify and manage areas suitable for eco-tourism, avoid encroachment on ecologically sensitive areas or habitats, and to ensure tourism activities do not exceed the ecological, environmental and transport carrying capacities of these sites. Part of the tourism revenue generated must be directly reinvested into the long-term protection, management, restoration and research of natural features at these sites.

1.3 Financing biodiversity conservation with emphasis on cross-sectoral collaboration

In 2003 the Government launched "**An Introductory Guide to Public Private Partnerships**"[4] (PPPs) which involve the use of private financing for the purpose of providing services. In view of the continued biodiversity loss and the dwindling public funds in Hong Kong, the Government should actively pursue PPP as a proactive conservation approach, working with a wide range of stakeholders (including businesses) to develop and implement innovative whole-of-society conservation efforts that mobilise private sector financial resources. Financing mechanisms can include green bonds, carbon markets and philanthropic resources, and it is important to ensure that PPPs add value to existing public funding and not simply displacing or substituting public resources. The Government must develop tracking, reporting, and disclosure standards to address potential challenges of PPP, ensuring public accountability and managing the complexities of implementation.

1.4 Promoting urban biodiversity for the benefit of people and nature

Supporting urban biodiversity can greatly improve a city's livability by alleviating environmental problems and improving human well-being. The Kunming-Montreal Global Biodiversity Framework (GBF) specifically emphasizes mainstreaming biodiversity in urban planning (Target 12), and **China's National Biodiversity Strategy and Action Plan (2023-2030)**[5] (NBSAP) also listed urban biodiversity as a Priority Action. With progressive urban renewal and new developments in the Northern Metropolis, Hong Kong is presented with a great opportunity to unlock the potential in promoting urban biodiversity. WWF suggests the Government to provide high-level policy support and guidance, and establish a cross-sectoral taskforce to leverage local expertise on biodiversity, health, education, urban planning and landscape design. There is a need to review and update the Hong Kong Planning Standards and Guidelines (HKPSG) to include biodiversity considerations, and to develop urban biodiversity masterplan for strategic developments such as those within the Northern Metropolis. Hong Kong should revolutionize the design and management of existing urban green spaces to unlock their potential as wildlife habitats, and provide incentives to private developers for adopting biodiversity-friendly designs in their projects.

[4] https://www.legco.gov.hk/yr04-05/english/hc/sub_com/hs02/papers/hs020221cb1-wkcd83-e.pdf
[5] https://chinadevelopmentbrief.org/wp-content/uploads/2024/02/China-Biodiversity-Action-Plan.pdf

1.5 Encouraging cross-border conservation initiatives for regional impact

Hong Kong is home to globally and/or nationally rare, transboundary species such as a number of migratory bird species, the Chinese White Dolphin, Eurasian Otter and White-bellied Sea Eagle. Strengthening coordination with conservation authorities in the Greater Bay Area, on actions such as transboundary species monitoring and wildlife corridor establishment, is essential for enhancing conservation outcomes, which is highlighted in China's latest NBSAP.

2. Adopting a Holistic Strategy for a Sustainable Marine Environment

2.1 Expanding Marine Protected Area (MPA) and Implementing "Effective Area-Based Conservation Measure" (OECM) through Marine Spatial Planning

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 conduct a pilot study on the Gross Ecosystem Product (GEP) on the marine waters of Greater Bay Area. The results, presented in WWF's "**Valuing the Invaluable Blue**"[6] report, demonstrated the exceptional ecosystem services value of the GBA's coastal water, and confirmed the feasibility of applying a marine valuation framework in Hong Kong with rich datasets from government, academia, and conservation NGOs. WWF recommends the government to adopt such tools to guide ecosystem-based marine spatial planning, so as to inform decision-making in establishing Fishery Protection Areas and OECMs for Hong Kong.

2.2 Enhancing sustainable aquaculture practices

To support the implementation of the "**Blueprint for Sustainable Development of Agriculture and Fisheries**"[7] (the Blueprint) outlined in the 2023, WWF recommends the government to prioritize the sustainable development of the aquaculture sector. Upgrading the Accredited Fish Farm Scheme under AFCD to include additional sustainability considerations, such as fish feed traceability, fish fry sourcing and waste discharge management, ensuring industry practices align with the Blueprint's sustainable vision. This will not only reduce ecological impact but also elevate consumer confidence in local aquatic products, paving the way for a premium branding of Hong Kong's aquaculture industry.

WWF recommends the committed new fishery research center in San Tin should establish a hatchery to reduce reliance on imported fry, which often lack transparency in sustainability, broodstock health and genetic diversity. In parallel, the new center should also focus on developing sustainable, traceable, locally produced fish feed to reduce reliance on imported fishmeal with ingredients derived from wild sources, while significantly lowering carbon footprint at the same time.

[6] https://www.wwf.org.hk/ocean_invaluableblue_e
[7] https://www.afcd.gov.hk/english/Blueprint/files/AFBlueprint_Eng.pdf

3. Leveraging Wetland Ecosystem Services for a Liveable Hong Kong

Wetlands are vital ecosystems that provide critical ecosystem services including food production, flood mitigation, water purification, and climate regulation. To safeguard these ecosystem services of wetlands in the Northern Metropolis and beyond, the Government must anticipate future climate challenges and invest in strengthening resilience in wetland ecosystem, and to leverage local wetland management experience in their management.

The Mai Po Nature Reserve has established itself as a regional benchmark for effective wetland management, and was recently awarded a Gold Star Wetland Centre at the Ramsar Convention on Wetlands COP15. These experiences, as well as those from other key wetland sites such as the Hong Kong Wetland Park and Long Valley Nature Park, offer valuable lessons for developing the flood-prone Northern Metropolis with Nature-based Solutions. By harnessing proven management experience, fostering knowledge exchange, and proactively invest in wetland management, the government can ensure that wetlands remain resilient, productive, and thriving natural assets for Hong Kong. It is also imperative to allocate sufficient financial and human resources to optimize wetland management, especially in the Wetland Conservation Parks of Northern Metropolis.

4. Tackling Wildlife Crime with Enhanced Regulations and Emerging Technologies

4.1 Increase penalties under Wild Animals Protection Ordinance and review the list of protected wild animals

Some native wildlife species continue to be harvested and traded, with certain protected species, such as freshwater turtles, frequently targeted by poachers. Recently, individuals were found illegally possessing and selling wild-caught turtles taken directly from Hong Kong's countryside. Despite being protected under the Wild Animals Protection Ordinance (Cap. 170), enforcement remains weak. These species are listed under CITES and globally Critically Endangered, yet the current lenient penalty under Cap. 170 fails to deter such wildlife crimes. WWF urges the government to substantially increase penalties under Cap. 170, and critically review the list of protected wild animals (Schedule 2), which has remained practically unchanged since the ordinance's enactment in 1976, taking into account of at-risk species listed in "**The State of Hong Kong Biodiversity 2025**"[8] and threatened marine species such as seahorses and horseshoe crabs.

4.2 Strengthening regulations on the exotic pet trade in Hong Kong

Hong Kong has experienced a sharp rise in exotic wildlife imports, particularly reptiles and birds, with nearly half of these traded species at risk of extinction. Invasive Alien Species, often introduced through the pet trade, are among the major drivers of global biodiversity decline. Recent reports indicate that Hong Kong is a major hub in the global trade of exotic pets, with endangered reptiles being the most sought after. As a global hub for the exotic pet trade, the city faces mounting ecological and public health risks. WWF asks the government to adopt a "positive

[8] https://www.wwf.org.hk/en/biodiversity/hkbiodiversity2025/

list" of permitted species—ensuring only animals proven suitable as pets are allowed to be imported and traded. This approach is internationally recognized for reducing biodiversity loss, improving animal welfare, and minimizing zoonotic disease risks. This action aligns with China's amended Biosecurity Law (April 2024), which mandates monitoring systems for imported species.

5. Leading Greener Energy Transition for a Regional Energy Paradigm Shift

The "**Action Plan on Green Maritime Fuel Bunkering**"[9] and the upcoming "Sustainable Aviation usage target" have demonstrated ambition and determination of the Hong Kong Government to play a leading role on greener energy transition of the aviation and maritime sectors. Since market-based measures play a crucial role towards meaningful implementation of sustainable fuel use towards net zero emissions under international sectoral frameworks of these two sectors, demand-side measures are key for amplifying the importance and role of Hong Kong on this topic. Fostering constructive regional dialogue on sustainable fuel value chain stakeholders, with local blending facilities to maintain openness of fuel supply in Hong Kong are key actions to ensure stable supply of sustainable fuel to Hong Kong at reasonable price over period, and to create strong demand signal to the industry.

Sector-specific eligible emissions units (EEU) and trading mechanisms, like International Civil Aviation Organization's (ICAO) Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) and International Maritime Organization's (IMO) Net Zero Framework, are being developed for operators in aviation and maritime sectors as part of the emissions reduction mechanism; financial sectors in Hong Kong should be more aware on its progression and develop capable emissions trading solutions to meet the rising needs from these sectors.

6. Elevating Innovation and Technology in Nature Conservation

6.1 Promoting technological advancement for conservation

Through partnerships with the private sector and the United Nations University Institute in Macau (UNU Macau), WWF aims to revolutionize environmental protection through digital innovation, leveraging cutting-edge technologies to address pressing conservation challenges. WWF encourages integrating conservation in the ongoing updates of the "**Hong Kong's Smart City Blueprint 2.0**"[10] that includes the "**Climate Action Plan 2030+**"[11] by recognizing tools and efforts enhancing climate and ecological monitoring, species identification, and data-driven decision-making. More broadly, AI should be integrated into Hong Kong's smart environment initiatives to promote sustainable development, ecosystem management, combat wildlife crimes, and optimize resource use through cross-sectoral innovation and digital infrastructure.

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[9] www.tlb.gov.hk/doc/Action_Plan_on_Green_Maritime_Fuel_Bunkering.pdf

[10] https://www.smartcity.gov.hk/modules/custom/custom_global_js_css/assets/files/HKSmartCityBlueprint(ENG)v2.pdf

[11] https://www.hkgbc.org.hk/eng/engagement/file/ClimateActionPlanEng.pdf

6.2 Ensuring responsible drone use to meet societal needs and conserve biodiversity

Hong Kong is actively developing its low-altitude economy (LAE) to boost economic growth, and the government is establishing a regulatory framework with initiatives such as moving the regulatory sandbox pilot projects forward. For nature conservation, drones enable efficient and less intrusive monitoring of ecosystems and biodiversity, but increased drone traffic can impact sensitive wildlife species through noise disturbance and possible bird collision, particularly in areas with high bird density such as the Deep Bay wetlands. It is essential to address the potential negative impacts on wildlife through careful planning, responsible practices, and ongoing monitoring. With inputs from relevant industries and stakeholders, the Government should formulate a regulatory framework including but not limited to designate “no-drone zone” over ecologically sensitive areas such as Special Area, Nature Park/Reserve, and bird flight path, establish regulations for low-altitude airspace management such as noise restrictions, and establish bird collision avoidance system to drive sustainable development in the LAE sector.

7. Mainstreaming and Curriculum Integration of Nature-based Education (NbE) in the School Sector

7.1 Formulating a NbE Curriculum Framework

At present, elements of environmental and sustainability education are scattered across the existing primary and secondary curricula without a coherent structure. This fragmentation limits coherence hence adversely affecting effectiveness on student learning and school culture. WWF recommends the Government to develop a comprehensive and integrated curriculum framework on NbE[12] to guide implementation at both the policy and school levels. This framework must ensure that sustainability themes are systematically embedded across all learning areas and subjects through nature-based approaches at every level of schooling—not only in traditionally relevant disciplines such as Biology and Geography at the secondary level, Science and Humanities at the primary level, and Nature and Living in kindergartens, but also integrated meaningfully into the broader curriculum to foster cross-disciplinary understanding and whole-school engagement.

Furthermore, the framework must prioritize action-oriented learning approaches that empower students to apply their knowledge in real-world contexts, cultivating their roles as informed and responsible active citizens to take actions for the environment. WWF recommends that every primary and secondary school student be required to participate in at least one outdoor learning experience in a natural environment in each academic year. Such experiences are critical for fostering a personal connection with nature and deepening students’ understanding of ecological systems. To ensure the quality and consistency of these experiences, the Government should establish a certification system for outdoor learning centers and agencies. This system would set

[12] https://iucn.org/sites/default/files/2023-11/iucn-cop-28-technical-brief-cec-nature-based-education-for-planetary-health.pdf

clear standards for safety, educational value, and environmental integrity, ensuring that all students benefit from high-quality, transformative nature-based learning.

7.2 Strengthening Professional Development on NbE

The introduction of Primary Science and Primary Humanities in the 2025/26 school year presents both an opportunity and a challenge. While the new subjects include dedicated strands such as “Environment and Living” and “Life and Environment”, many teachers may lack the necessary expertise and confidence to deliver these topics effectively. To address this, the Government should mandate teacher training on NbE as a core component of Continuous Professional Development. This requirement will incentivize participation and ensure that educators are equipped with the knowledge and pedagogical skills needed to deliver high-quality environmental education. Given the current scarcity of training resources—particularly in biodiversity and nature conservation—the Government should collaborate with tertiary institutions, NGOs, and professional bodies to design and deliver targeted professional development programmes, including field-based training at accessible biodiversity hotspots. Additionally, outdoor biodiversity education should be designated as a compulsory component, with clear requirements for learning hours and frequency to ensure consistent and impactful implementation.