



# The Environmental Management Association of Hong Kong Limited

10 July 2025

Biodiversity Conservation Division  
Agriculture, Fisheries and Conservation Department  
5th Floor, Cheung Sha Wan Government Offices  
303 Cheung Sha Wan Road  
Kowloon, Hong Kong  
(Email: bsap@afcd.gov.hk)

Dear AFCD Colleagues,

**EMAHK Response to the Public Consultation on  
Updating Hong Kong's Biodiversity Strategy and Action Plan (BSAP)**

Established in 2010, the Environmental Management Association of Hong Kong Limited ("EMAHK") is a charitable organisation in accordance with the Inland Revenue Ordinance Cap.112 Section 88, which aims to be a leading and recognised contributor to environmental management and sustainable development discourse, as well as to the advancement of environmental management as a professional field.

EMAHK calls for a nature-positive approach that looks to adding ecological value and restoring nature, rather than just stopping biodiversity loss. It is imperative to mainstream biodiversity in all sectors of society through raising awareness, building capacity and fostering partnership. In response to the Public Consultation on Hong Kong's Biodiversity Strategy and Action Plan (BSAP), EMAHK welcomes the Government's effort in reviewing and updating the last BSAP, aligning Hong Kong's city-level BSAP with the key principles of China's National BSAP (NBSAP) and the Kunming-Montreal Global Biodiversity Framework (KMGBF) at the international level. We also support the four strategic focus areas identified by the Government that guide the next phase of the BSAP, namely (i) nature conservation, (ii) deepening mainstreaming, (iii) capacity building, and (iv) collaborative partnering.

In the remainder of this submission, we will detail our views and recommendations under three major topics: (i) eco-tourism, (ii) urban development and biodiversity sensitive design, and (iii) capacity building.

## **1. Eco-tourism**

### **Eco-tourism: A Path to Sustainable Development**

1.1. Eco-tourism plays a vital role in promoting sustainable development by encouraging the appreciation and conservation of natural and cultural assets. In Hong Kong, eco-tourism offers a unique opportunity for residents and visitors to explore the diverse countryside and islands, contributing to a deeper understanding of the city's and region's ecological and cultural heritage. Beyond its recreational and educational value, eco-tourism can also serve as a new source of income, particularly for stakeholders in remote villages and islands who rely on local resources. However, the success of eco-tourism depends greatly

on sustainability, requiring a balance between conservation, community development, education, and nature-based activities that respect ecological and social systems.

## The Importance of Planning and Management

- 1.2. The remote and underdeveloped nature of many eco-tourism destinations demands careful planning to handle increased visitor traffic without over-exploiting the environment or local communities. It is crucial for the Government, local communities, and NGOs to assess the carrying capacity of these areas and evaluate potential environmental and social impacts. A proactive, evidence-based approach is necessary, including regular monitoring and surveys to manage vulnerable habitats and species. Adaptive management, guided by scientific research, should be implemented to respond effectively to evolving challenges.
- 1.3. Investing in the conservation of natural environments and the protection of habitats is essential for the long-term viability of eco-tourism. A coordinated, cross-departmental approach is required, with adequate resources allocated for swift responses to damage and threats. This includes addressing issues such as solid waste management, sewage treatment, land use changes, pollution, invasive species and the over-exploitation of local flora and fauna. Initial investments in infrastructure, monitoring, and law enforcement will ensure that eco-tourism destinations are well-equipped to handle increased visitors while preserving their natural and cultural assets.

## Nature Finance and Accountability

- 1.4. Eco-tourism should adopt the principles of nature finance, ensuring accountability for the depletion of natural and biodiversity assets. A portion of the income generated from eco-tourism activities should be reinvested in conservation efforts to maintain the ecological integrity of these destinations. This aligns with international practices of double materiality, emphasising the importance of preserving natural resources and biodiversity in a non-consumptive manner.
- 1.5. On the other hand, Hong Kong, as one of the world's leading financial centres, should take the lead in employing economic instruments to finance works and promotion of biodiversity, including eco-tourism. Biodiversity-positive incentives like payment for ecosystem services, environmentally-motivated subsidies, bonds for conservation, taxes and fees can mobilise finance and address market failure in biodiversity loss, on top of the traditional regulatory command and control, in a cost-effective way. The Policy Instruments for the Environment (PINE), a database of OECD Environmental Policy Committee, provides qualitative and quantitative data across 146 countries worldwide as reference.
- 1.6. To enhance credibility and prevent greenwashing, the Government or local civil society should establish local standards for eco-tourism. These standards, based on international best practices, should provide clear guidelines for tour operators, hiking guides, and other stakeholders to ensure the quality and sustainability of the services offered.

## Eco-friendly Hiking Trails

- 1.7. Hiking is one of the most popular eco-tourism activities in Hong Kong, but the increasing construction of concrete trails poses significant environmental challenges. Concrete trails will disrupt plant communities, fragment habitats, and alter ecological processes. Additionally, their construction methods often lead to pollution and soil erosion, further impacting biodiversity. The trails serve not only humans but also as connecting corridors for other wildlife. The aesthetic value in the natural environment, comfort for hikers, as well as impacts during building and repair should be taken into consideration.
- 1.8. To mitigate these issues, green groups and engineering consultants have proposed alternative eco-friendly trail designs. Using sustainable materials and construction methods, these trails align with the principle of “Leave No Trace,” minimising their environmental footprint. Developing standardised guidelines and materials lists for eco-trail construction would greatly facilitate the adoption of these practices.

## Mainstreaming Nature-based Solutions

- 1.9. For eco-tourism to thrive in Hong Kong, it is essential to promote proper behavior and good practices among both visitors and local stakeholders. Educational campaigns can raise awareness about the importance of protecting habitats and biodiversity. By fostering a conservation-minded culture, eco-tourism can base on the global standards of nature-based solutions, benefiting both biodiversity, human well-being and the local economy.
- 1.10. Eco-tourism holds immense potential for Hong Kong, offering economic, educational, and environmental benefits. However, its success relies on careful planning, sustainable practices, with a commitment to conserving natural and cultural assets to ensure biodiversity net gain. By investing in eco-tourism, Hong Kong can showcase its unique ecological and cultural heritage while promoting sustainable development with proper economic instruments to uphold our natural capital for future generations.

## **2. Urban Development and Biodiversity Sensitive Design**

- 2.1. Land use change and urban development in Hong Kong often lead to loss of habitats and biodiversity. As the recovery of natural habitats and biodiversity are sometimes impossible or may take a long period of time, Biodiversity Sensitive Urban Design approach should be considered to integrate biodiversity considerations with new development, for example in the Tung Chung New Town extension and the Northern Metropolis. More careful investigation of conservation areas should be conducted before development. Projection of population and development needs should be reviewed and analysed to justify the size of land required for development to avoid further disturbance to the natural habitats.
- 2.2. Incorporating urban ecological corridors and inclusive green-blue infrastructure into urban renewal are good approaches. Eco-shoreline is one of the good examples of biodiversity design that has been studied and implemented in Tung Chung new

development areas. However, this concept has not been extended into the whole development area. Tung Chung River Park could be a trial to examine this nature-based solution for flood management. This approach should be promoted and adopted in more sites during the planning and design phases. Local native species in the surrounding areas should be studied and selected or adapted from elsewhere to reduce the ecosystem degradation. Other practical measures for integrating biodiversity conservation into urban systems should also be considered, including sustainable drainage system (SuDS) and slope maintenance.

- 2.3. Sufficient urban green areas should also be provided and connected to enhance the movement and dispersal of wildlife. The fringe areas of country parks usually act as a buffer zone between nature and the urban environment. The loss of these areas to development may increase the number of animals, such as wild boars and monkeys, getting into the urban areas. A harmonised relationship with nature and wildlife could be developed by investigating and researching into the feasibility of using nature-based solutions and biodiversity sensitive urban design.

### **3. Capacity Building**

#### Expanding Ecological Impact Assessment Requirements

- 3.1. Currently, comprehensive ecological impact assessments are only mandatory for certain designated projects with potential negative ecological impacts under the Environmental Impact Assessment Ordinance (EIAO), leaving potential gaps in biodiversity conservation. To address this, it is recommended to extend comprehensive ecological impact assessments to also include project types with minor ecological impacts. This can be supported by enhancing the Hong Kong Biodiversity Information Hub (HKBIH) database.

#### Developing General and Sector-Specific Guidelines for Biodiversity-Friendly Practices

- 3.2. Given the varying nature of business across different sectors and their operational impacts on biodiversity, standardised general and sector-specific guidelines on biodiversity conservation should be developed to help sectors adopt biodiversity-friendly practices. The Government should collaborate with representatives from various sectors, academics, NGOs, and professional groups to create these guidelines. General guidelines could include fundamental practices such as natural resource conservation, sustainable consumption, and circular economy practices. Sector-specific guidelines would provide tailored advice, including but not limited to setting biodiversity goals, assessing sector-specific ecological impacts, implementing mitigation measures, engaging stakeholders, and monitoring progress.

#### Fostering Cross-Sector Commitment to Biodiversity Conservation

- 3.3. To incentivise participation, a Biodiversity Conservation Charter Scheme could be established, similar to existing climate-focused charters in Hong Kong. This voluntary scheme would encourage businesses, organisations, and individuals to commit to biodiversity-friendly practices by setting goals and implementing actions, participating in

capacity-building workshops, utilising knowledge-sharing platforms, and receiving recognition for exemplary performance.

### Strengthening Public Capacity Through Knowledge Transfer and Community Engagement

3.4. EMAHK supports initiatives to strengthen innovative research in tertiary institutions, promote knowledge transfer through accessible platforms, and nurture talent through specialised academic and general education programmes. Equally crucial is raising public awareness across all age groups. Government-NGO partnerships should implement community programmes featuring educational seminars on ecological values, sustainable consumption and eco-tourism. Practical training should cover species identification, ecological footprint reduction, and citizen science initiatives like monitoring local species and habitats. These collected data would significantly enhance Hong Kong's biodiversity database while fostering widespread environmental stewardship.

### Establishing Comprehensive Public Awareness Training Programmes and Funding

3.5. With the BSAP update, EMAHK proposes the launch of a "Nature Positive City 101 Awareness Training Programme" to build capacity among various stakeholders in restoring, improving, and protecting nature while balancing development with sustainability. Targeting government departments and authorities, educational institutions, businesses, NGOs, and communities, the programme will equip participants with practical knowledge through a series of in-person workshops, digital learning platforms, and field-based training. Upon completion of the training, participants will be able to integrate nature-positive practices into urban planning, industry operations, and daily life, thereby enhancing multi-stakeholder engagement. In addition to potential support from existing funding schemes, it is also proposed to introduce a 'Biodiversity Awareness Grant' to support training in educational institutions, NGOs, and communities.

## **4. Enquiries**

4.1. For enquiries related to this submission, please contact the undersigned at [simon.ng@emahk.org](mailto:simon.ng@emahk.org) or [info@emahk.org](mailto:info@emahk.org)

Yours faithfully,



Simon Ng  
Chair

The Environmental Management Association of Hong Kong Limited