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By email bsap@afcd.gov.hk

Biodiversity Conservation Division
Agriculture, Fisheries and Conservation Department

Dear Sir/ Madam,

Updates to Hong Kong Biodiversity Strategy and Action Plan (BSAP)

On behalf of the Hong Kong Institute of Landscape Architects (HKILA), we are pleased to submit our response to the public consultation on BSAP. Our response is structured responding to the four strategic areas and the ten guiding questions in the consultation document.

Vision, Opportunities and Challenges for Hong Kong in Nature Conservation

From 19th century's Frederick Law Olmsted (designer of the Central Park of New York, also known as the father of landscape architecture) who believed in the vital role of nature in improving the well-being of people, to the 1960s Ian McHarg who published the book "Design with Nature", to Mr. Yu Kongjian of modern time who promoted the concept of "Sponge Cities", landscape architect is a profession uniquely trained and positioned to addressing climate change and vast biodiversity loss through the planning and design of the built-environments, and putting theories into practice. As we have stepped into the most critical decade in human history to tackle the rapidly declining biodiversity that is leading to the instability of ecosystems, the HKILA fully supports the conservation and enhancement of biodiversity in Hong Kong and the government's positive actions in BSAP.

The consultative document has rightfully pointed out that Hong Kong, as a world-renowned financial centre housing over 7.5 million people within the just above 1100 km² of land area, supports remarkable biodiversity, both marine and terrestrial. Our

city has the potential of becoming the showcase of our national vision of ecological civilization and to the world towards a sustainable future.

It was emphasized in COP16 that biodiversity conservation cannot be relied upon a single government agency but a “whole-of-government” approach that integrates biodiversity considerations across different policies and actions of the government. It is therefore vital that the upcoming HK BSAP 2025 is committed by the Chief Executive in his policy address to ensure support from all government bureaux and departments for its effective implementation.

A cross-sector platform should be established that is comprised of representatives from relevant government bureaux including EEB, DEVB, HYAB, major works/ maintenance departments, relevant professional institutes and organizations. This could be an expansion of the current IWGB or a separate platform with the aim to foster actions, establishing key indicators, and to review the progress of biodiversity in the city. There are various existing government-led committees related to greening or conservation such as the Community Involvement Committee on Greening, Urban Forestry Advisory Panel, Countryside Conservation Office, and funding resources such as Urban Forestry Support Fund, Environmental Conservation Fund, Countryside Conservation Funding Scheme. For the best utilization of resources, we recommend the government to review these existing mechanisms and explore integrating or synergizing them for the goals under BSAP.

Mainstreaming Biodiversity & Nature-based Solution (NbS) in Urban Development

We have the following recommendations regarding mainstreaming biodiversity and integrating NbS in Urban Development:

1. Incorporate biodiversity in the whole life cycle of urban development from planning to implementation to management & maintenance.
2. On top of the over 40% of country parks and other protected areas, set out timeline to increase marine protected areas from the current 5% to 30% to align with the KMGBF's targets.
3. Actively explore restoration of ecologically degraded land out of urban development. Last year HKILA collaborated with CEDD in establishing a pilot

mini-forest adopting the Miyawaki planting method, HKILA & CEDD established a joint task force this year with the aims to measure the performance of this pilot project and to establish standard specification for mini-forest to scale-up the eco-restoration method to other projects.

4. Review and explore OECMs for existing or planned areas with ecological significance or with other cultural and socio-economic values.
5. Incorporate BSAP/ NbS in existing planning and development tools, such as the Hong Kong Planning Standards and Guidelines and Town Planning Board Guidelines.
6. Domesticating international standards such as the IUCN Global Standard for NbS into local planning and design standards.
7. Review the provision of Site Coverage of Greening under the current development control framework from purely quantitative to incorporate performance-based requirements including biodiversity.
8. Hong Kong has approximately 2000 hectares zoned as open space that can potentially contribute to our urban biodiversity. We propose to have at least 20% of the total area of open space (i.e. approximately 400 hectares) as “eco-friendly” zone, on their design and maintenance. In the long run the eco-friendly zones could also be part of the OECMs initiative.
9. In the planning of new development areas (NDA), to minimize unnecessary site-formation works, ensure priority given to preserving environmental and ecological resources, such as open landscape, mature forest, water bodies, that should inform the disposition of future open space and open space network.
10. Riding on Hong Kong’s advantage as an international financial centre and the government’s initiative in aligning local standards with ISSB, the government should further facilitate the uptake of financing biodiversity through requirements on nature-related disclosure such as TNFD.
11. Taking measures in ensuring sufficient and reliable supply of native species for greening works in urban developments.

12. Incorporating biodiversity in our education system. On this respect, HKILA is supporting DEVB and EDB in incorporating landscape architecture as part of STEAM education, which biodiversity should be part of it.

International and regional collaborations

HKILA shares the importance of global connectivity and collaboration as emphasized in the consultation document. As one of the most established landscape institutes in Asia, HKILA has access to the wealth of knowledge and experience through our membership and the international communities of landscape architects through The International Federation of Landscape Architects (IFLA). Last year, UNFCCC in collaboration with IFLA published “Works with Nature” that gathered the theory and practice of nature-positive design in various regions of the world and presented at COP29. Regarding regional collaboration, HKILA took a leading role in establishing the Guandong-Hong Kong-Macao Greater Bay Area Ecology and Landscape Alliance in 2018 and joined force with the other cities of GBA in establishing standards related to landscape works. In March 2025, HKILA hosted the first International Climate Change and Biodiversity Conference in collaboration with IFLA Asia-Pacific Region with experts from IUCN and over 10 Asian countries/ regions participating, during the event we signed an MoU with WWF-HK and Kadoorie Farm and Botanic Garden for cross-sector synergy. HKILA and The Institute of Landscape Architects Malaysia are currently working together on NbS-Asia initiative. HKILA together with Civic Exchange and HKU’s School of Biological Science hosted the Post-COP16 Hong Kong Forum. In October next year, HKILA will host for the first time IFLA World Congress 2026, the largest international event on landscape architecture and planning. Aligned with your vision, our active role in international and regional affairs fostering cross-pollination has geared promising outcomes, we are happy to continue working together with the government and other stakeholders in achieving the common goals.

Yours sincerely,





THE HONG KONG INSTITUTE OF LANDSCAPE ARCHITECTS

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Cc:

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