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**Submission on the Public Consultation of Hong Kong's First Five-Year Plan for
Economic and Social Development (2026–2030)
Views from Business Environment Council Limited
商界環保協會有限公司**

Over the last 34 years, Business Environment Council Limited 商界環保協會有限公司 (“BEC”) has played a leading role in advocating the business case for environmental excellence, given the importance of sustainable development to Hong Kong. Our members are committed to actively engaging with the HKSAR Government (“the Government”) to help develop a supporting policy framework as well as impactful implementation in respect of environmental protection and sustainability.

As the global climate discourse evolves, BEC recognises that achieving long-term sustainability requires balancing ambitious emission reductions with a pragmatic clean energy transition and robust climate adaptation strategies. Views expressed in this submission are those of BEC, in line with BEC’s Mission and Vision as well as policy position on relevant issues but may not necessarily be the same as the views of each individual member. BEC is an independent non-profit membership organisation comprising over 300 member organisations including multinational corporations, listed companies, small and medium-sized enterprises, startups and NGOs.

[A] Key Principles

Hong Kong’s First Five-Year Plan for Economic and Social Development (2026–2030) is a timely opportunity to embed climate and green transition into the city’s economic and social development. BEC recommends that the Plan explicitly position climate action, energy transition, resource circularity, and ecological resilience as the core drivers of Hong Kong’s future economic competitiveness. This requires environmental policy to move beyond a compliance and conservation mindset and become an industrial, financial, and spatial strategy that secures Hong Kong’s status as an international financial, trade, maritime, aviation, and innovation hub. By aligning with China’s National 15th Five-Year Plan and leveraging its role as an international financial centre and GBA gateway, Hong Kong can advance decarbonisation, climate resilience, biodiversity, resource efficiency, and green innovation while strengthening long-term competitiveness.

The following principles provide the foundation for BEC’s submission, positioning sustainability as a core driver of growth, resilience, innovation, investment, and long-term prosperity.

1. Anchoring Sustainability as a Core Economic Driver

Sustainability should be treated as a core economic priority, not a standalone environmental issue. Climate action, decarbonisation, biodiversity, and resilience can strengthen competitiveness, create new industries, improve public well-being, and

deepen GBA integration. Major developments such as the Northern Metropolis should embed green-blue infrastructure, biodiversity protection, and climate adaptation from the outset to avoid costly retrofits and support long-term growth.

2. Positioning Hong Kong as a Global Leader in the Transition Economy

Hong Kong should lead the transition economy by scaling green finance, clean energy, energy efficiency, circular economy, sustainable aviation and maritime fuels, biodiversity protection, and urban climate resilience. Each sector should be supported by a clear green enabler, including SAF for aviation, green fuel bunkering for maritime, and eco-tourism for culture and tourism development.

3. Synchronising Local Roadmaps with the National 15th Five-Year Plan

Hong Kong's Five-Year Plan should align closely with the National 15th Five-Year Plan, the national agenda for Ecological Civilisation, and support the country's dual carbon targets. Clear alignment will help Hong Kong strengthen transition finance, connect international and mainland standards, and support national and GBA's growth as a leading green economy.

4. Adopting a Holistic View

The Plan should adopt an integrated approach across the economy, society, and environment. Climate action, biodiversity, public health, energy security, innovation, infrastructure, and regional development should not be considered in isolation but should be advanced together through clear roadmaps, measurable targets, cross-bureau coordination, and regular progress reviews.

[B] Policy Directions and Key Proposals

Building on the key principles set out in Part I, Part II presents BEC's policy directions and key proposals for integrating environmental priorities into the major themes of Hong Kong's First Five-Year Plan. These recommendations aim to demonstrate how sustainability, climate resilience, biodiversity and nature conservation, decarbonisation, resource efficiency, and green innovation are directly relevant to Hong Kong's economic and social development. By embedding these priorities into key policy areas, the Plan can support long-term competitiveness, improve public well-being, attract investment, strengthen regional co-operation, and position Hong Kong as a leading green and resilient economy. BEC's recommendations are organised around six parts corresponding to the main themes of the Five-Year Plan.

Part 1: Accelerate Northern Metropolis Development and Advance Spatial Planning in Other Areas

Part 1 focuses on accelerating the Northern Metropolis and advancing strategic spatial planning. BEC recommends that the Five-Year Plan include a dedicated Green Development chapter under Part 1 to ensure environmental priorities, nature-based solutions, smart-green infrastructure, and climate resilience are embedded from the outset and treated as core enablers of sustainable growth, liveability, and long-term competitiveness. Embedding low-carbon design, fundamental ecological resilience and proactive nature conservation into Hong Kong's largest-ever capital investment is not an environmental add-on: rather, it is essential to

safeguarding the long-term value, insurability, and investment appeal of these assets and an indicator of a successful high-quality development.

1.1. Advancing Sustainable and Green Development in the Northern Metropolis

To realise the Northern Metropolis (“NM”) as a world-class, future-ready growth engine, BEC strongly recommends that the Government add a dedicated Green Development chapter in Part 1: Accelerate Northern Metropolis Development and Advance Spatial Planning in Other Areas. This chapter should position green development as a central pillar of spatial planning and set clear directions for biodiversity conservation, enhancement of ecological value, low-carbon development, climate adaptation, smart-green infrastructure, and nature-based solutions. A dedicated chapter would embed sustainability and climate resilience from the outset and position the NM as a leading model of sustainable urban development in the Greater Bay Area (“GBA”) and beyond.

- **Northern Metropolis as a World-Class Green Development and Nature-based Solutions Hub**

The Northern Metropolis should be positioned as a leading Nature-based Solutions (“NbS”) hub, balancing development and conservation. The Five-Year Plan should recognise ecological assets, including the Mai Po and Inner Deep Bay Ramsar Site, wetlands and traditional fishponds, and Robin’s Nest Country Park, as strategic natural infrastructure supporting climate resilience, biodiversity, and sustainable growth. China’s National 15th Five-Year Plan identifies green development as a key pillar of national modernisation, highlighting the need to protect natural ecosystems through conservation efforts. In particular, efforts should be made to protect the existing ecological corridor between Shenzhen’s Wutong Mountain and Hong Kong’s Robin’s Nest to strengthen local biodiversity and ecological integration. Commitments to proactive conservation, biodiversity enhancement, ecological corridors, and wetland conservation parks, central to the 2021 Northern Metropolis vision, should be re-embedded in the proposed First Five-Year Plan.

Furthermore, in line with the Hong Kong Biodiversity Strategy and Action Plan (“BSAP”) 2035 and the Hong Kong NbS Design Guidelines (“HKNbSDG”), ecological capacity should be enhanced alongside development. Given the low-lying, flood-prone nature of NM sites, BEC recommends a “biodiversity net gain” approach for major projects, requiring measurable ecological improvements and NbS as first-line defences against flood and heat risks. Land planning and subsequent ecological baseline formulations within the Northern Metropolis should also refer to and align with the national approach. By investing in nature, Hong Kong can reduce climate risks, support biodiversity, attract talent and investment, and create a model where conservation and development reinforce one another.

- **Zero-Carbon Industrial Park and Smart, Green and Resilient Infrastructure**

Smart, green, and resilient infrastructure should form a cornerstone of the Northern Metropolis’s development. By integrating smart energy systems, waste recycling, green-blue infrastructure, low-carbon materials, and climate-resilient design from the outset, the NM can become a showcase for sustainable urban development. Drawing on the mainland’s “zero-carbon industrial park” concept, the Government should establish “Net-Zero Carbon Zone” pilots, incorporate new energy systems and low-carbon infrastructure into the Northern Metropolis blueprint. This approach will support Hong Kong’s carbon neutrality goals, strengthen the GBA integration through shared technical standards and innovation, attract green investment, and create a scalable model for climate-resilient communities across Asia.

1.2. Establishing Consolidated Climate Adaptation Governance for the Northern Metropolis

Given the NM's unprecedented scale, multi-decade delivery timeline, and exposure to flooding, storm surge, and extreme heat, all of which will contribute to economic losses. BEC recommends establishing a consolidated climate adaptation governance structure for the NM as a whole, rather than relying on fragmented, project-by-project delivery. A dedicated cross-departmental mechanism with clear accountability, a unified climate-risk assessment baseline, and common resilience design standards would reduce delivery risk, avoid costly retrofits, provide certainty to investors, lenders, and insurers, and ensure that adaptation measures such as drainage, coastal protection, and cooling infrastructure are planned coherently across districts and infrastructure networks.

Part 2: Economy, Finance, and Trade

Part 2 focuses on strengthening Hong Kong's roles as an international financial, trade, maritime, and aviation centre. BEC recommends integrating green and transition priorities into these sectors to enhance competitiveness, mobilise capital for decarbonisation, and support Hong Kong's development as a leading hub for the transition economy. As global markets and supply chains decarbonise, green capability is becoming a condition of hub status: capital, cargo, and connectivity will flow to centres that can finance, fuel, and insure the transition.

2.1. Enhancing Hong Kong's Competitiveness in Green Finance

Prioritising green and transition finance within the Five-Year Plan is critical to Hong Kong's economic resilience and competitiveness as a leading international financial centre. Domestically, mobilising private capital is essential to fund the infrastructure and decarbonisation investments needed to meet Hong Kong's 2035 and 2050 climate targets. Regionally, green and transition finance represents a significant growth opportunity, building on Hong Kong's position as Asia's leading sustainable finance hub. By strengthening its ecosystem through initiatives such as blended finance, the Hong Kong Taxonomy, and voluntary carbon markets, and interoperable trading platforms that support book-and-claim mechanisms and cross-border market participation over commodity like green and alternative fuels, Hong Kong can reinforce its role as the premier gateway for international capital supporting China's and Asia's low-carbon transition.

Green and transition finance should be a cross-cutting enabler for resilient infrastructure, green technology, the circular economy, and regional co-operation. Key priorities include operationalising the Taxonomy, scaling blended finance, and improving access to climate-risk data for accurately pricing physical and transition risks.

The Plan should provide dedicated support for SMEs to access transition capital. It must establish a clear pathway for carbon market development, deepening Mainland connectivity to solidify Hong Kong as the gateway for Asian carbon trading.

2.2. Advancing Sustainable Aviation Fuel Development

As airlines face increasingly stringent emissions requirements and rising carbon costs, SAF remains the most viable near- to medium-term pathway for aviation decarbonisation. By leveraging Hong Kong's strengths as an international financial, trading and aviation centre, Hong Kong can play a in developing Asia's SAF ecosystem, unlocking new economic opportunities and reinforcing its aviation competitiveness. BEC recommends the importance

in Part 2 to emphasise Hong Kong's status as an international aviation hub and drive the adoption of Sustainable Aviation Fuel ("SAF") (in addition to maritime centre mentioned in the draft). Under the current Five-Year Plan, SAF is referenced under Part 6: Integrated Development of Culture, Sports and Tourism, Green Living. However, SAF should be recognised as an economic and competitiveness enabler for Hong Kong's aviation hub, not merely a decarbonisation measure.

The Five-Year Plan should support a "GBA production, Hong Kong blending, trading and application" model. This includes strengthening feedstock collection and processing, supporting regional production partnerships, developing SAF blending and airport fuelling infrastructure, and establishing internationally recognised certification and carbon-accounting capabilities. Hong Kong should also position itself as a hub for SAF-related financing, sustainability-linked investment, commodity trading and book-and-claim transactions that are interoperable with diverse regional production ecosystems across Asia. It needs to also consider broader Asian/ASEAN partnership framework on SAF and its feedstocks sourcing. These measures would create new economic opportunities, attract investment and talent, strengthen aviation competitiveness, and reinforce Hong Kong's role as a gateway connecting international capital with Asia's low-carbon transition.

2.3. Developing Green Maritime Fuels and Bunkering Infrastructure

To consolidate Hong Kong's status as an international maritime centre as global shipping decarbonises, the Five-Year Plan should set out a clear strategy for an alternative marine fuels portfolio together with the associated bunkering infrastructure, safety and handling standards, and fuel certification systems. The portfolio should include both near-term solutions, such as sustainable drop-in marine biofuels that can leverage existing bunkering infrastructure, and longer-term fuels such as green methanol. As major Asian ports move rapidly to capture green bunkering demand under the IMO's decarbonisation framework, first-mover investment in multi-fuel bunkering capability, port electrification and shore power, and green shipping corridors with GBA and international ports will be critical to defending Hong Kong's hub competitiveness. Beyond defending market share, green maritime services can create new value chains in fuel trading, certification, insurance, and marine professional services.

Part 3: Innovation, Technology, and Industry Development

Part 3 focuses on accelerating the city's development into an international I&T centre and an international hub for high-calibre talents, nurture and grow emerging and future industries, there by promoting the high-quality development of Hong Kong. BEC recommends treating the climate imperative itself as an industrial opportunity: green, climate, and adaptation technology is a fast-growing global market in which Hong Kong can convert its research strengths into jobs, investment, and exports.

3.1. Expanding the Green and Low-Carbon Technology Ecosystem

Expanding the green and low-carbon technology sector is critical to Hong Kong's long-term economic competitiveness and transition to a sustainable, innovation-driven economy. Support should extend beyond research and development to include piloting, commercialisation, and large-scale deployment. Strengthening collaboration among industry, academia, and research institutions, while deepening integration with the Mainland and GBA innovation ecosystem, will help translate local innovations into market-ready solutions. At the same time, enabling policies and infrastructure should encourage the adoption of proven and internationally recognised climate and green technologies, including by encouraging financial

institutions to provide more competitive financing solutions for projects and technologies that deliver measurable emissions reductions and long-term decarbonisation benefits, positioning Hong Kong as a leading hub for green innovation and the transition economy. BEC recommends designating green, climate, and adaptation technology as a priority industry sector in the Five-Year Plan, alongside AI and health technology. This explicit recognition would unlock critical funding, land, talent, and government procurement, transforming the climate imperative into a powerful engine for jobs, investment, and exports.

The Five-Year Plan should incorporate within the proposed new University Town multi-disciplinary school(s) focusing on climate innovation and solutions, integrated with GBA and internationally, to accelerate development and upscaling of technologies, business models and societal mechanisms to contribute to climate repair to help to reverse the geo-engineering to improve the climate for future generations.

3.2. Leveraging Government Procurement and Public Projects to Accelerate Green Innovation

The Government should leverage public procurement, government facilities, infrastructure projects and major developments as demonstration platforms for innovative green and climate technologies. By acting as an early adopter and lead market maker, the Government can help validate emerging solutions, create initial market demand, attract private investment, and accelerate commercialisation. Priority areas could include energy management, climate adaptation technologies, circular economy solutions, low-carbon construction materials, renewable energy systems, digital twins and smart infrastructure. This approach would help strengthen Hong Kong's green technology ecosystem, bridge the gap between research and deployment, and support the development of new industries and economic opportunities.

3.3. Cultivating a High-calibre Green Talent Pipeline

Developing a strong pipeline of green talent is essential to supporting Hong Kong's transition to a high-value, sustainable economy. The Five-Year Plan should attract and retain top researchers, international students, and innovative enterprises to strengthen Hong Kong's position as a leading global talent and green transition hub. Priority should be given to strategic fields such as green technology, energy, sustainability, artificial intelligence, and green finance through measures including research funding, talent admission schemes, housing support, and greater professional mobility within the GBA. Coupled with stronger sustainability education and professional training programmes, these efforts will help address critical skills gaps, accelerate innovation, and reinforce Hong Kong's role as a leading green knowledge and innovation hub. Beyond top-tier talent, vocational and technical green-skills training should be expanded in tandem (see Section 4.2) to build the full spectrum of workforce capabilities required for the transition.

3.4. Accelerating the “Digital Twin” Transition

Hong Kong should promote the convergence of digitalisation and decarbonisation as a defining feature of its I&T agenda. The Five-Year Plan should support the application of AI, IoT, cloud, and big data for city-wide environmental monitoring, energy grid optimisation, building energy management, and predictive climate modelling. The Government should work towards an integrated “digital-green twin” of the city, with open data access for enterprises and researchers to spur innovation. To support growing demand for AI and digital services, the Plan should promote green data centres with stringent energy and water efficiency standards, and low-carbon energy sources. This convergence would sharpen policy precision, lower

compliance costs for business, strengthen extreme-weather early warning, and create exportable smart-city and climate-tech solutions.

3.5. Industrialising New Energy Systems and Strengthening Ecological and Energy Security

The Five-Year Plan should treat the industrialisation of new energy systems including green and low-carbon hydrogen production, storage, and certification; SAF and biofuel value chains; battery energy storage; and EV battery reuse and recycling as a strategic industry development opportunity that simultaneously strengthens Hong Kong's ecological and energy security. Building on the Strategy of Hydrogen Development in Hong Kong, the green and low-carbon hydrogen certification framework under development, and the EV battery recycling facility at Eco Park, Hong Kong can anchor high-value segments of the regional new energy industry chain while diversifying its energy supply, reducing exposure to fossil fuel price volatility, and supporting the national goal of building a clean, low-carbon, safe, and efficient energy system.

3.6. Establishing an Upstream Enabled and Resilient Circular Economy

BEC suggests putting strong emphasis of circular economy in Part 3 of the Five-Year Plan than just in Part 6 as it drives industry development and jobs creation. Building a resilient circular economy is essential to transforming waste management from a cost burden into a source of economic value, resource efficiency, and supply chain resilience. The Five-Year Plan should adopt a life-cycle approach that prioritises upstream measures such as waste prevention, circular product design, repairability, reuse, and green procurement, with an initial focus on major streams like food and packaging waste, reducing waste before it enters the municipal system. This should be supported by a strong local recycling and resource recovery industry that recognises secondary materials as valuable economic assets. The Plan should also strengthen government-industry collaboration through structured public-private partnerships to enhance recycling infrastructure, improve system performance, and expand public awareness and participation. To drive investment and innovation, Hong Kong should provide long-term policy and regulatory certainty while strengthening collaboration with the GBA and broader region on resource recovery, recycling infrastructure, and circular value chains. Together, these measures can accelerate the development of a competitive and resilient circular economy and advance the vision of a "Zero Waste Bay Area."

Part 4: People's Livelihood and Social Development

Part 4 focuses on enhancing policies on education, healthcare, housing, social welfare, labour, and elderly care. BEC recommends integrating climate resilience and environmental health considerations into these areas to better protect public well-being, support vulnerable communities, and build a healthier, more resilient society. Protecting climate-vulnerable communities and preparing the workforce for the transition are also economic imperatives: they preserve labour productivity, contain healthcare costs, and maintain the social stability on which competitiveness depends.

4.1. Addressing Climate Risks to Public Health

The Five-Year Plan should recognise climate change as a growing public health challenge with significant implications for social well-being, healthcare systems, and economic productivity. Extreme heat and worsening air quality are already affecting public health, with local studies linking heat exposure to more than 3,200 excess deaths over the past decade.

In 2025, Hong Kong recorded 53 “very hot days” and 54 “hot nights”, highlighting the increasing frequency and intensity of heat-related risks. Rising temperatures also worsen air pollution by accelerating the formation of surface-level ozone, increasing respiratory and cardiovascular illnesses and placing additional pressure on healthcare services. These impacts disproportionately affect vulnerable groups, including the elderly, outdoor workers, and residents of subdivided units and other inadequate housing — who face the highest indoor heat exposure and the least capacity to adapt, with the potential to widen existing inequalities. The Five-Year Plan should therefore incorporate climate adaptation measures, structural cooling strategies, and integrated heat-health warning systems to reduce health risks, enhance community resilience, protect workforce productivity, and support a healthier and more inclusive society.

4.2. Planning for a Just Transition, Green Workforce Development and Sustainability Education

The Five-Year Plan should explicitly link the green transition to labour policy through proactive green-jobs and just-transition workforce planning. This should include green-skills training and certification programmes, reskilling pathways for workers in hard-to-abate and transitioning sectors, and regular forecasting of workforce demand in growth areas such as building retrofits, clean energy, e-mobility, waste and resource management, and environmental services. Early and structured workforce planning will ensure workers and communities share in the opportunities of the transition, relieve the skills bottlenecks that could otherwise slow decarbonisation delivery, and preserve social stability and productivity as the economy transforms. At the same time, the Plan should strengthen public education and community sustainability awareness-raising programmes on energy conservation, waste reduction, resource efficiency, and sustainable living, helping to improve sustainability literacy, encourage behavioural change, and build public support for Hong Kong’s carbon neutrality and sustainability goals.

Part 5: Development of Regional Co-operation

Part 5 focuses on deepening regional integration and international collaboration. BEC recommends strengthening co-operation with the GBA, the Mainland, Belt and road partners and global partners on green development to accelerate decarbonisation, enhance climate resilience, and position Hong Kong as a leading gateway for the transition economy.

5.1. Strengthening Regional Co-operation for Green Developments

Hong Kong is well positioned to serve as a super-connector and gateway for the transition economy, linking Mainland priorities with international capital, standards, technology, professional services, and business networks. A formalised public-private collaboration mechanism that brings together policymakers, investors, technology providers, academia, and industry would further strengthen this role by improving coordination and aligning policies, investment, and innovation. Within the GBA and the Mainland, Hong Kong can accelerate regional green development by deepening co-operation in areas such as new energy, carbon markets, circular economy solutions, and blue-green corridors. Building on this role, Hong Kong can further support Belt and Road partners and the wider world by sharing its strengths in climate adaptation and resilience, green finance, and corporate sustainability. This layered approach would support national green development priorities while reinforcing Hong Kong’s position as a leading international gateway for sustainable development and the transition economy. Highlighting co-operation in green development is significant, as collaboration

opportunities in these areas can generate economic, environmental, and social advancements for Hong Kong, the region, and its international partners.

- **Strengthening Regional Co-operations with the GBA and Mainland on Green Development**

- **Public-private partnerships:** Strengthen cross-boundary public-private partnerships to mobilise capital, technology, and expertise for green infrastructure, new energy, climate technology, and circular economy initiatives, accelerating regional collaboration and sustainable development across the GBA and the Mainland.
- **New energy and low carbon transport:** Strengthen cross-boundary collaboration on zero-carbon electricity, renewable energy, and shared hydrogen, SAF, “drop-in” transition fuel (e.g. renewable diesel) and alternative marine fuel supply chains to enhance energy security and support regional decarbonisation. Leverage on national and GBA’s experience to accelerate Hong Kong’s transition to low carbon / emission vehicles and infrastructure (e.g. charging, battery swap, refilling infrastructure).
- **Carbon markets:** Promote carbon credit recognition, standards alignment, and stronger linkages between Hong Kong’s Core Climate platform, the Mainland’s CCER scheme, and regional emissions trading pilots, reinforcing Hong Kong’s role as an international carbon market gateway.
- **Circular economy:** Advance cross-boundary circular economy standards and framework to facilitate the flow of recycled and recovered resources such as recycled plastics, metals and construction debris, while deepening collaboration on resource recovery, recycling infrastructure, green procurement, and circular value chains to support a “Zero Waste Bay Area”.
- **Blue-green corridors:** Support cross-boundary ecological connectivity, ecosystem restoration, and nature-based solutions, including initiatives linked to river basins, coastal areas, wetlands, and biodiversity corridors.

- **Advancing Green Development through Belt and Road and International Collaborations**

- **Climate adaptation and resilience:** Work with Belt and Road and global partners on heat resilience, flood management, nature-based solutions, and climate-resilient infrastructure, drawing on Hong Kong’s world-class experience as a dense coastal city.
- **Green finance:** Leverage Hong Kong’s strengths as an international financial centre to mobilise capital, advance transition finance, and provide professional services for sustainable infrastructure and low-carbon projects across Asia and beyond.
- **Corporate sustainability:** Building on Hong Kong’s experience, partner with Belt and Road and regional partners to strengthen their sustainability disclosure, climate-risk management, supply-chain decarbonisation, green procurement, and corporate governance, helping businesses meet evolving international expectations.

Part 6: Integrated Development of Culture, Sports and Tourism, Green Living

Part 6 focuses on the integrated development of culture, sports, and tourism to build a more distinctive, vibrant, and appealing world city. BEC recommends leveraging this opportunity to advance environmental protection, accelerate the green transition, and strengthen Hong Kong's climate resilience. Chinese Mainland has adopted a dedicated Five-Year Action Plan for Carbon Peaking with key performance indicators, Hong Kong should take reference and determine clear priorities and actions to drive decarbonisation, promote green living, and support sustainable economic development. Delivering deep, sector-by-sector emissions reduction across energy, buildings, transport, and waste is essential to lowering operating costs, enhancing energy efficiency, strengthening energy resilience, and keeping Hong Kong's businesses competitive.

6.1. Promoting Opportunities in Eco-Tourism

Eco-tourism presents an opportunity to diversify Hong Kong's tourism offering, support local communities, and showcase local biodiversity and responsibly promote nature conservation. Building on growing interest in destinations such as Sai Kung and Lantau, the Five-Year Plan should promote high-integrity and sustainable eco-tourism experiences across terrestrial and marine environments, further strengthening the Development Blueprint for Hong Kong's Tourism Industry 2.0. Nature-based solutions should be leveraged to create healthy ecosystems and opportunities for eco-tourism, climate resilience and sustainable development, aligned with the national ecological civilisation concept and with international frameworks such as the Kunming-Montreal Global Biodiversity Framework. This will require stronger collaboration among relevant government departments to develop distinctive countryside, coastal, island, and marine tourism offerings and require active engagement of environmental experts, ecologists and local community. Such efforts can help realise the Northern Metropolis Action Agenda's vision for a Blue and Green Recreation, Tourism and Conservation Circle, demonstrating how conservation and economic development co-exist. By leveraging its extensive country parks, 263 islands, coastline, and marine resources, Hong Kong can establish itself as a leading eco-tourism destination while supporting the long-term conservation of its natural landscapes and natural capital.

6.2. Advancing Nature-based Solutions and Biodiversity Conservation

Nature and biodiversity must be recognised as strategic assets in Hong Kong's climate, resilience, and development agenda. The Five-Year Plan must promote wide adoption and implementation of Nature-based Solutions ("NbS") to support climate mitigation, adaptation, and biodiversity objectives, while delivering co-benefits such as flood risk reduction, urban cooling, enhanced carbon sequestration, and lower building energy demand. By recognising ecological assets as critical natural infrastructure, Hong Kong can strengthen climate resilience while generating environmental, social, and economic value. In parallel, the Plan should support the conservation of native species and strengthen forest carbon management to enhance local carbon sinks, contributing to the goals of the Climate Action Plan 2050 ("CAP2050") and aligning with national priorities under China's 15th Five-Year Plan. The Plan should further recognise blue carbon ecosystems as investable and invaluable carbon-sink assets. Quantifying and protecting terrestrial and blue carbon sinks, developing high-integrity local carbon sequestration methodologies, and enabling nature financing instruments would allow public and private capital to flow into conservation, consistent with the updated Biodiversity Strategy and Action Plan and the national Ecological Civilisation agenda. By embedding biodiversity and NbS within broader climate and development strategies, Hong

Kong can protect its natural capital, enhance long-term resilience, and support a more sustainable and competitive economy.

6.3. Exploring a Dedicated Energy Office to Steer Strategic Energy Planning

To coordinate long-term energy development and align with national energy strategies, the Government should explore the option of an “Energy Office” within its governance structure dedicated to mapping out Hong Kong’s energy development blueprint. The functionality should focus on these strategic directions: leveraging Hong Kong’s strengths to better integrate into the national energy development framework; coordinating resources to ensure energy security; fostering the new energy and new fuel hubs as mentioned in Part 2 and Part 3, and commercialising green fuels to drive the city’s green economy.

6.4. Defining Sectoral Decarbonisation Pathways and Targets

To support Hong Kong’s transition to a low-carbon economy and align with the national “dual carbon” goals of peaking emissions before 2030 and achieving carbon neutrality before 2060, the Five-Year Plan should establish clear sector-specific decarbonisation pathways and interim targets. The forthcoming update of the CAP2050 provides an opportunity to translate long-term climate ambitions into measurable actions across key sectors, particularly hard-to-abate areas such as transport, aviation, shipping, buildings, and industry. Drawing on national examples where clear sectoral targets have guided policy and investment, Hong Kong should develop implementation roadmaps, milestones, and performance indicators to accelerate low-carbon technology adoption, provide certainty for businesses and investors, and strengthen accountability. This more structured approach will help keep Hong Kong on a credible pathway towards its climate goals while enhancing its competitiveness in the transition economy. Particular attention should be given to aviation and maritime sectors, where decarbonisation is increasingly linked to Hong Kong’s competitiveness as an international aviation and maritime hub.

6.5. Advancing Low-Carbon and Climate-Resilient Buildings

Achieving Hong Kong’s carbon neutrality goals will require the large-scale decarbonisation and modernisation of its ageing building stock, which accounts for a substantial share of the city’s energy use and carbon emissions. The Five-Year Plan should prioritise deep retrofits of existing buildings through energy-efficiency upgrades, modern cooling systems, and measures to reduce operational and embodied carbon. Building on the full implementation of [the amended Buildings Energy Efficiency Ordinance in September 2026](#), the Plan should move beyond mandatory energy performance disclosure and benchmarking (such as energy use intensity, “EUI”) by progressively extending requirements across the building stock and introducing whole-life carbon assessments for construction materials. While greater transparency can drive voluntary improvements, the scheme should also establish statutory minimum EUI performance standards tailored to different building types and ages. This is becoming increasingly urgent as climate change intensifies heat stress; [in 2025 alone, Hong Kong recorded 53 “very hot days” and 54 “hot nights”](#), driving greater reliance on air-conditioning and higher electricity bills. By integrating building modernisation, whole-life carbon management, and climate adaptation, Hong Kong can reduce emissions and energy costs, strengthen energy resilience, and accelerate its transition to a low-carbon, climate-resilient city.

6.6. Scaling New Energy Solutions and Green Technology Adoption

The Government adopts the right approach in accelerating electrification as the primary pathway for decarbonising Hong Kong's economy. However, maintaining a diversified energy system will be critical to enhancing energy security, system resilience, and affordability throughout the transition, requiring a multi-energy comprising electricity, low-carbon gases, hydrogen and other cleaner fuels. Hard-to-abate sectors such as aviation, maritime transport, construction, and heavy industry will require a broader mix of low-carbon energy solutions, in line with the National 15th Five-Year Plan's objective of developing a clean, low-carbon, safe, and efficient energy system. It should also strengthen the collection and processing of Used Cooking Oil ("UCO") and other sustainable feedstocks to support regional biofuel supply chains and create green economic opportunities. Alongside clean fuel deployment, greater support should be provided for the research, piloting, and commercialisation of climate technologies, including carbon capture, utilisation and storage ("CCUS"), energy storage, climate adaptation technologies, and low-carbon materials. By accelerating the adoption of sustainable fuels and climate technologies, Hong Kong can enhance energy resilience, support industrial decarbonisation, and strengthen its position as a regional hub for clean energy and climate innovation.

Aligning with the national direction on wider electrification of the transport sector, the Five-Year Plan should establish clear targets for commercial vehicle electrification and subject to technology development consider phasing out plan of internal combustion engine ("ICE") commercial vehicles with market consultation. Stronger incentives and strategic planning for charging infrastructure would facilitate transport electrification, reduce emissions, and contribute to Hong Kong's carbon neutrality objectives.

6.7. Introducing Green Consumption Incentive Mechanisms

To mobilise households and consumers as active participants in the green transition, the Five-Year Plan should introduce green consumption incentive mechanisms. Options include rebates or vouchers for energy-efficient appliances and low-carbon products, green points or loyalty schemes linked to recycling, energy saving, and low-carbon travel, and clearer eco-labelling to guide consumer choice. Demand-side incentives would accelerate market transformation for green products and services, complement producer responsibility schemes and the GREEN@COMMUNITY network, and embed green living in daily life, supporting the Plan's green living objectives with tangible, positive engagement rather than reliance on regulation alone.

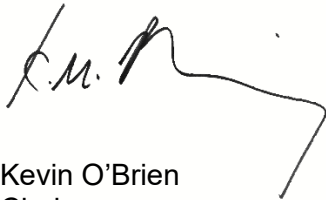
6.8. Promoting Green Mega Events

While the Government works to boost the mega-event economy relating culture, sports and tourism, many of the international events are placing sustainability as key requirement when planning and deciding host city. The Government should also build up its capacity to host green mega events, by supporting and encouraging organisers, venues and participating enterprises to strengthen waste sorting and recycling arrangements, improve recycling facilities, and enhance post-event recovery of recyclable materials.

Enquiries

For queries related to this submission, please contact our Chief Executive Officer, Mr Simon Ng at simonng@bec.org.hk.

Yours sincerely,



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Chairman
Business Environment Council Limited