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**Statement of Support to the updated Hong Kong Biodiversity Strategy and Action Plan
(BSAP) 2035 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.

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 charitable membership organisation comprising over 300 member companies from Hong Kong’s major holding companies to small and medium-sized enterprises.

Background

Over the past two years, BEC has continued to engage and build relationships with the business community on nature and biodiversity-related topics, having been an active contributor to the Hong Kong Biodiversity Expert Group and lead of the Business for Biodiversity Focus Group, co-lead of the Taskforce on Nature-related Financial Disclosures (“TNFD”) Hong Kong Consultation Group, and established the Nature and Biodiversity Advisory Group with BEC members to raise awareness, discuss enabling policies and drive corporate initiatives. BEC is committed to continuing to engage the local business community and collaborate with the Government to promote business action and strengthen policy ambition for biodiversity in Hong Kong.

BEC welcomes the release of the updated [Hong Kong Biodiversity Strategy and Action Plan \(“BSAP”\) 2035](#) and acknowledges the Government’s proactive efforts and commitment to outline its priority actions for Hong Kong to adopt over the next decade. The updated BSAP follows Hong Kong’s original BSAP from 2026-2021 and will be crucial to shaping the city’s ambition for biodiversity conservation and sustainable development.

It is encouraging to see that the updated BSAP takes references from the latest national targets, given that Hong Kong’s BSAP forms part of China’s [Biodiversity Conservation Strategy and Action Plan \(2023-2030\)](#) (“NBSAP”), and high-level international developments, namely the [Kunming-Montreal Global Biodiversity Framework \(“GBF”\)](#). BEC also welcomes the Government’s incorporation of relevant objectives that align with recommendations from BEC’s earlier [Submission on the Hong Kong Biodiversity Strategy and Action Plan 2025 – 2035](#) and other stakeholders’ input during the public consultation period. In response to the updated BSAP and its four outlined strategic areas, BEC would like to offer the following support and comments.

Area 1: Nature Conservation

BEC commends the Government’s commitment to establishing new protected areas across Hong Kong, which is crucial to supporting biodiversity conservation and maintaining habitat intactness. Additionally, the Government’s commitment to exploring the application of Other Effective Area-based Conservation Measures (“OECMs”) to safeguard both terrestrial and marine biodiversity, alongside commitments to protect native species. BEC is pleased to see greater recognition of ecosystem services and the vital functions they provide to society. In particular, assessing local habitats to better understand and valuing Hong Kong’s ecosystem services will help to quantify the city’s economic dependencies on its nature and rich biodiversity, and reinforce the long-term business and economic case for conservation.

Area 2: Deepening Mainstreaming

The strategic inclusion of Priority Action 2.3 on encouraging businesses on nature-related disclosure is a noteworthy step forward amid a rapidly evolving landscape, particularly with the International Sustainability Standards Board’s recent announcement on forthcoming corporate nature-related disclosure requirements. The commitment to promote voluntary adoption of the TNFD framework is strongly welcomed and aligned with BEC’s submission recommendation. BEC believes that Government support for corporate adoption, together with possible incorporation of biodiversity-related risk disclosure to the Environmental, Social

and Governance (ESG) Reporting Code, would be highly effective in driving uptake across the local business community and provide companies with a clear rationale for disclosure. To further support the mainstreaming of nature-related considerations into Hong Kong's society and regulatory landscape, BEC looks forward to seeing biodiversity-relevant content and nature-climate linkages in the upcoming mid-term review of the Climate Action Plan 2050. As mentioned in BEC's initial submission, clear top-down policy signalling is required to drive business action.

Moreover, the Government's recognition of systematically embedding biodiversity into the city's financial architecture and securing long-term investment through various schemes and mechanisms to support conservation goals is very encouraging. BEC commends all three priority projects listed under Priority Action 2.4, particularly the potential development of an effective platform to mobilise resources from varied stakeholders. The BSAP's recognition of nature-based solutions is encouraging and BEC sees several areas of alignment with its recommendations, particularly those relating to development projects, green building practices and supporting climate resilience.

Area 3: Capacity Building

Aside from mainstreaming biodiversity, we are pleased to see the inclusion of continual assessment and monitoring of local biodiversity and blue-green habitats to establish baselines and understand changes, and to continue to bolster significant data gaps that exist. The Government's support for research and knowledge transfer, through the provision of funding and resources, will be crucial to ensuring knowledge and data can support evidence-based decision-making for the city's sustainable development and biodiversity conservation.

Area 4: Collaborative Partnering

BEC supports the BSAP's commitment to strengthening collaboration and partnerships, recognising that regional and international collaboration is essential to address the complexities surrounding nature and biodiversity conservation in this rapidly changing climate. To aid such efforts and support long-term impact, BEC suggests the Government consider its previous recommendation to establish a multi-stakeholder biodiversity task force to drive partnerships, mobilise resources and ensure measurable progress between various stakeholders including the private sector, financial institutions, industry associations and other expert stakeholders.

Conclusion

To ensure the success of Hong Kong's BSAP 2035, it is essential for the Government to consider mechanisms enabling effective implementation. Adequate financial resources must be allocated to enable several priority actions mentioned and further engage stakeholders, as well as the setting of clear interim targets and specific key performance indicators to monitor and assess progress and evaluation over time. In parallel, strong policy signalling through integrating biodiversity into upcoming policy and regulation, such as the Climate Action Plan 2050's mid-term review. From a business perspective, this is an opportunity to reinforce rationale and build the business case further for business action on biodiversity.

BEC fully supports the Hong Kong Biodiversity Strategy and Action Plan (BSAP) 2035 and stands ready to facilitate the business sector and other stakeholders in the implementation of nature-related initiatives under the BSAP.

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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