



1. WWF Hong Kong welcomes the Government of the HKSAR recognition of the importance of ecologically important sites under private ownership.
2. While conservation is fundamentally in the public interest, we would expect the Government to formulate a comprehensive conservation policy for Hong Kong based on an in-depth review of the existing policy. However, we are disappointed by the inadequacy of the review process. For instance, it is only focused on private lands while neglecting other imperatives that a comprehensive nature conservation policy review should cover, such as marine conservation, sustainable resource management, and conservation of genetic and species diversity.
3. Nevertheless, we welcome the revision of the conservation policy statement, which has set up clearer vision and objectives. We suggest the Government should formulate clear action plans with milestones and benchmarks for achieving these objectives. The Government should also set a clear goal of **“no net loss of biodiversity”**.
4. We in general welcome the two options proposed by the Government to better conserve these ecologically important sites. However a strong, long-term political commitment by the Government is necessary for the success and sustainability of the conservation projects.
5. For the Management Agreement option, the Government must take responsibility to review the performance of this option in terms of it being able to maintain or enhance the biodiversity of the site under management.
6. While the duration of pilot scheme would only last for 24 months at most (paragraph 2.3, Guideline to Application – Pilot Conservation Management Agreement Projects), the Government needs to secure the sustainable management of each site until the scheme proven to be successful.
7. For the Public-Private Partnership option, a clear goal, preferably with measurable targets, of *in-situ* “no-net-loss of biodiversity” or in the other words, the maintenance the biodiversity of the sites, should be included as a fundamental consideration for the approval of a project.
8. The establishment of conservation trust for the long-term management of the designated sites by the developers should be encouraged. Furthermore, the Government should demonstrate its commitment to nature conservation by the establishment of conservation trust for Hong Kong, which could be used for different aspects of Hong Kong’s nature conservation.
9. Contingency plans should be formulated by the Government for the pilot sites for the two options to minimize the damage on the ecological values of the sites in case the pilot schemes fail.



10. Immediate measures, including active site monitoring, have to be undertaken by the authorities in order to protect the 12 sites from any undesirable activity which may destroy their ecological value before the sites are protected and the pilot schemes proven to be successful.
11. The Government needs to have the political will and provide adequate resources, especially financial support, to protect our natural heritage for the long-term benefits of the Hong Kong community.
12. It is essential that conservation be integrated with other governmental policies, including town planning and sustainable development.
13. WWF Hong Kong is looking forward to a long-term and comprehensive conservation policy for a sustainable future of Hong Kong.