

Engagement Discussion

Pack Two:
Applying the
Governance
Framework

STRENGTHENING CLIMATE GOVERNANCE: FROM TARGETS TO DELIVERY IN HONG KONG

April 2026

Pack Two: Applying the Governance Framework

Chapters 4-8

This pack contains Chapters 4 to 8 of the Engagement Discussion document *Strengthening Climate Governance: From Targets to Delivery in Hong Kong*. It applies the analytical framework introduced in Pack One to examine how Hong Kong's climate governance system functions in practice.

Purpose of this Pack

Pack Two is intended to support informed diagnosis and structured reflection on Hong Kong's existing climate governance. It focuses on institutions, coordination mechanisms, policy processes, and implementation pathways.

By examining Hong Kong's climate governance through a structured, internationally informed framework, Pack Two aims to:

- Demonstrate how current arrangements support or constrain delivery,
- Highlight cross-cutting governance challenges that recur across policy areas; and
- Support shared understanding among different parts of government and society.

It is offered as a basis for dialogue and learning, recognising that strengthening climate governance is an ongoing process that benefits from multiple perspectives and continuous refinement.

The analysis is designed to be constructive and system-oriented. Its purpose is to identify how Hong Kong's governance system operates, where its strengths lie, where tensions or gaps arise, and how delivery capacity might be strengthened within existing institutional realities.

What this Pack Contains

- **Chapters 4-8: Hong Kong Through the Five Pillars of Climate Governance**
These chapters examine Hong Kong's climate governance system through the Five-Pillar framework introduced in Pack One Chapter 3, covering:
 - Long-term vision, targets, and strategic direction
 - High-level political leadership and whole-of-government coordination
 - Integration across all policy sectors ("mainstreaming")
 - Transparency, Monitoring, Reporting and Independent Review
 - Stakeholder and public engagement

Each chapter focuses on governance structures, decision-making arrangements, and policy instruments relevant to that pillar, drawing on official strategies, institutional arrangements, and observed practice.

Taken together, these chapters provide a systematic picture of how climate governance is organised in Hong Kong, how different government bureaux, departments and regulatory agencies interact, and how climate priorities are embedded, or sometimes fragmented, across policy domains.

How to Use This Pack

Pack Two is designed to be read in a modular and flexible way:

- Readers may focus on individual chapters corresponding to their area of responsibility or interest.
- Chapters can be used as reference material for internal discussion and stakeholder engagement.
- The pack works best when read alongside Pack One, which sets out the conceptual framework and comparative context.

This pack prepares the ground for:

- Pack Three (Case Studies), which examines specific policy areas in greater depth.

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HONG KONG PILLAR 1: LONG-TERM VISION, TARGETS, AND STRATEGIC DIRECTION

I. INTRODUCTION

Evolution of Climate Leadership in Hong Kong

Hong Kong's approach to climate governance has developed progressively over the past decade and a half. The first time the HKSAR Government explicitly treated climate change as a strategic policy issue was in 2010, when the then Environment Bureau launched *Hong Kong's Climate Change Strategy and Action Agenda* for public consultation.¹ This early discussion framed climate mitigation primarily through the lens of energy policy, reflecting the city's recognition that electricity generation was, and remains, its dominant emissions source. At the time, this included proposals to import substantially more nuclear-generated electricity from Guangdong Province, potentially supplying up to half of Hong Kong's electricity needs. Although this idea did not come to fruition following the Fukushima accident in 2011,² it marked an important turning point: Hong Kong recognised that decarbonisation of the electricity sector would require regional cooperation and access to clean energy beyond its borders.

This strategic direction has remained consistent. The HKCAP2017 and HKCAP2021 both place low-carbon electricity at the centre of the transition, including clean energy imported from the Chinese Mainland. While the earlier plans did not articulate a statutory target, they provided the foundation for Hong Kong's subsequent commitments in 2020-2021: to strive for carbon neutrality before 2050, and to reduce emissions by 50% before 2035 relative to 2005 levels. Hong Kong has maintained these commitments.

With this background in place, the focus of this chapter is to examine how Hong Kong performs on Pillar 1: Long-term vision, targets, and strategic direction, and what reforms could strengthen the system.

II. WHY LONG TIME HORIZONS MATTER FOR HONG KONG

Pillar 1, as set out in Pack One Chapter 3, examines the ability of a government to set long-term climate-related direction and sustain it over time. This requires political leadership, institutional arrangements, policy stability, and the capacity to coordinate across portfolios, budgets, and planning cycles.

This pillar is important for Hong Kong because:

- Climate commitments require sustained planning and policy stability for long-term continuity. This enables industry, businesses, and the public to act with confidence. Credibility depends on consistent political leadership and administrative follow-through.
- Hong Kong is a highly autonomous sub-system within China, meaning its long-term targets (e.g., carbon neutrality before 2050) must be coherent with Mainland ambitions (peak before 2030, carbon neutrality before 2060) while preserving local policy space to achieve milestones.
- The city's carbon profile is dominated by electricity generation and consumption, requiring multi-decade planning for energy saving, energy

transformation, and cross-boundary arrangements with Guangdong Province.

- Hong Kong faces extraordinary climate risks and biodiversity loss, requiring long-term planning, investment and continuous strengthening of institutional and physical resilience.
- As a global financial centre, commercial and logistics hub, and maritime and aviation centre, Hong Kong's climate leadership also shapes its competitiveness, market positioning, and regulatory evolution.

Thus, evaluating Hong Kong under Pillar 1, this report assesses how Hong Kong's own hybrid governance system can strengthen its ability in the vision, authority, and institutional coherence needed to deliver deep decarbonisation and resilience over decades.

III. HONG KONG'S LONG-TERM CLIMATE COMMITMENTS AND TARGETS

1. Background

As early as the 2010 Climate Change Strategy and Action Agenda consultation noted above, the HKSAR Government acknowledged that Hong Kong, as one of the most developed parts of China, should adopt a step-by-step approach to climate change. At that time, it proposed a carbon-intensity reduction target for 2020. The target was met, largely via strengthened building energy codes and collaboration with industry to improve standards for electrical appliances. Hong Kong also participated in Asia-Pacific Economic Cooperation's (APEC) regional energy-intensity reduction initiatives. These achievements reflected a period in which Hong Kong was beginning to consider climate change primarily through energy saving measures.

Between 2010 and 2020, however, the broader policy landscape changed profoundly, both globally and within the Chinese Mainland. Climate change rose

rapidly on the global agenda, China and the United States played pivotal roles in securing the Paris Agreement in 2015, and China moved decisively to integrate climate and green finance considerations into national policy. The People's Bank of China (PBOC) – China's central bank – released guidelines to “green” the Chinese Mainland's financial system in 2016,³ and green finance became a central theme of the G20 meetings in Hangzhou in 2016, when China held the G20 presidency. These efforts culminated in President Xi Jinping's 2020 announcement that China would peak carbon emissions before 2030 and achieve carbon neutrality before 2060.

Together, these developments transformed the context for Hong Kong. By the late 2010s, the Chinese Mainland had made major strides in climate and energy policy and had elevated green finance to a national priority, creating strong strategic and political momentum for Hong Kong to raise its ambition and move beyond incremental energy saving toward a long-term, whole-economy decarbonisation pathway. In parallel, and to complement the global momentum around COP21 and the birth of the Paris Agreement, Hong Kong published its first comprehensive *Climate Change Report 2015*,⁴ covering greenhouse gas emissions, mitigation, adaptation, and resilience. Although the HKSAR Government was not yet prepared to set long-term targets, the report demonstrated a clear recognition of the breadth and depth of the policy transformation required to address climate change.

2. 2050 Carbon Neutrality Commitment

Hong Kong's long-term commitments provide the backbone of its climate governance architecture. Three milestones define its trajectory. With the publication of *CAP2030+* in 2017, Hong Kong introduced its first structured decarbonisation framework, organised around four pillars: electricity generation, buildings, transport, and waste. Although this plan did not set an economy-wide long-term climate target, it incorporated a series of sectoral timelines and commitments grounded in earlier policy

work: the *Energy Saving Plan 2012-2015* (later updated for 2015–2025+), which set the goal of reducing energy intensity by 40% by 2025 relative to 2005 levels; the *Hong Kong Blueprint for Sustainable Use of Resources 2013–2022*, which outlined a waste management and reduction strategy; and *Deepening Energy Saving in Existing Buildings* in January 2017,⁵ which laid out the policy framework for improving energy performance in the existing building stock. In 2016, Hong Kong also published its first *Biodiversity Strategy and Action Plan (BSAP)*,⁷ signalling increasing recognition that climate action and ecological protection needed to advance in parallel.

CAP2050, published in 2021, went significantly further. It established Hong Kong's first explicit decarbonisation timeline, committing to strive for carbon neutrality before 2050 and to halve emissions by 2035 relative to 2005 levels. The 2021 plan deepened the focus on clean electricity, set new long-term electricity demand reduction targets for commercial and residential buildings, strengthened electrification pathways for transport, and identified HK\$240 billion in climate-related infrastructure investment over the coming 15-20 years. Together, the 2017 and 2021 plans form the core of Hong Kong's long-term climate strategy, with the 2021 plan marking its decisive embarkation on a whole-economy decarbonisation trajectory. These commitments provide essential directional certainty for government officials, regulators, businesses, investors, and the public.

3. Continuity Across Administrations

A defining feature of Hong Kong's political system is the relative continuity of policy direction across administrations. This stands in contrast to political systems where political leadership can alternate between parties with fundamentally different ideological positions on climate change. In such systems, climate policy is often vulnerable to abrupt shifts or even reversals from one administration to the next. The United States provides a clear illustration: federal climate policy was expanded

under the Obama administration (2009-2017), rolled back under the first Trump administration (2017-2021), and then re-established and strengthened under the Biden administration (2021-2025), only to be reversed again under the second Trump administration (2025-current). These alternating political priorities have created periods of discontinuity that have affected investment signals, regulatory pathways, and international credibility.

It was precisely to avoid this type of political volatility that the United Kingdom chose to enshrine climate policy into law through the CCA. The CCA's statutory carbon budgets and legally binding long-term targets were designed to constrain the degree to which future governments, of any political persuasion, could depart from nationally agreed climate objectives. In effect, the CCA serves as a structural mechanism to stabilise climate governance in the face of electoral change. Few other British policy domains have received this level of institutional protection, underscoring the premium placed on long-term stability in climate policy.

Hong Kong's situation is different. Historically, under the pre-1997 colonial administration, Hong Kong operated under an executive-led model with policy continuity anchored in a colonial governance structure without partisan competition. After 1997, the executive-led system was preserved under the Basic Law. The Chief Executive is explicitly non-partisan and leads a government that does not alternate between competing political parties. While Hong Kong has a range of political parties represented in the Legislative Council, these do not form or lead governments in the Westminster or presidential sense. As a result, the political structure places a premium on administrative stability, and major policy directions tend not to undergo dramatic ideological swings from one administration to the next.

Since 1997, Hong Kong has had five Chief Executives, all operating within this executive-led governance model. While each administration has introduced its

own priorities and policy programmes, the overall climate and environmental policy trajectory has been one of incremental strengthening rather than reversal or volatility. Once targets or major strategies have been announced, especially the commitment to achieve carbon neutrality before 2050 and to halve emissions by 2035, there has been no indication of retreat from these directions.

Taken together, Hong Kong's governance structure provides an effective mechanism for maintaining strategic continuity in climate policy. Hong Kong relies on the stability of its executive-led system and the consistency of long-term administrative planning. This creates a governance environment in which long-term climate commitments, once articulated, can be maintained across successive administrations, providing a degree of predictability for all stakeholders and high credibility.

4. The Chinese Mainland's long-term direction and HKSAR

Hong Kong's long-term climate trajectory must also be understood in the context of the Chinese Mainland's evolving policy direction. As a highly autonomous actor under "one country, two systems," Hong Kong retains the ability to set its own climate targets and formulate its own strategies. At the same time, it operates within the national framework and belongs to a rapidly developing regional economy shaped by China's policies, energy systems, and climate commitments.

Successive Five-Year Plans have deepened structural reforms in energy, innovation, and ecological conservation. China's climate ambition increased substantially between 2010 and 2020. Beyond its instrumental role in the conclusion of the Paris Agreement in 2015, China introduced a series of far-reaching policy reforms that expanded the scope and scale of national climate action. The release of the PBOC's 2016 *Guidelines for Establishing the Green Financial System* signalled the integration of climate and environmental objectives into financial regulation. China's policy progress culminated in President Xi

Jinping's 2020 30/60 announcement, providing a clear and long-term national direction.

It is hard to imagine that Hong Kong would not align with national climate-related policy. Hong Kong's decision to commit to carbon neutrality before 2050, a more ambitious timeline than the national 2060 target, reflects its economic profile as a rich, service-based, globally connected city, while remaining broadly consistent with China's overall national trajectory. Furthermore, Hong Kong's most carbon-intensive sector, electricity generation, is directly linked to regional energy developments. Guangdong Province is advancing large-scale expansion of zero-carbon energy, including offshore wind, solar, nuclear, and pumped-storage capacity. Parallel reforms in Mainland power markets, interprovincial transmission, and regional trading platforms will shape Hong Kong's long-term decarbonisation options, particularly its strategy for zero-carbon electricity imports.

The relationship is therefore characterised by interdependence: Hong Kong sets its own targets and strategies, but these must ultimately be coherent with Mainland policy evolution, regulatory reforms, and the broader development framework of the Greater Bay Area (GBA). GBA development strategies emphasise innovation, green transformation, ecological protection, and regional integration. As these priorities will continue to deepen in the 15FYP (2026-2030), Hong Kong faces both opportunities and expectations to align its long-term climate planning, particularly in clean electricity, energy efficiency, green finance, adaptation, and nature conservation.

This alignment does not diminish Hong Kong's autonomy; rather, it positions the city within a dynamic economic region undergoing one of the world's fastest clean energy transitions. As Guangdong Province accelerates the decarbonisation of its power system and expands its green manufacturing capabilities, Hong Kong's long-term climate pathway will increasingly depend on how effectively it can leverage regional integration while preserving the policy flexibility needed to meet its own 2035 and

2050 targets. Hong Kong's capacity to navigate this balance – integrating with the GBA where beneficial while maintaining autonomy in strategy and regulation – will be central to the credibility and feasibility of its decarbonisation commitments. It also determines how well the city can draw on broader GBA and national development priorities to mobilise the substantial financing required for its own and China's overall climate transition.

IV. EVALUATION: HOW HONG KONG PERFORMS UNDER PILLAR 1

Hong Kong's performance under Pillar 1 (long-term vision, targets, and strategic direction) shows both substantial progress and areas requiring further development.

Hong Kong now has a clear long-term decarbonisation trajectory, grounded in its commitments to strive for carbon neutrality before 2050 and to halve emissions by 2035 relative to 2005 levels. These targets are broadly aligned with global expectations for advanced economies and consistent with the Chinese Mainland's national 30/60 strategy. The climate plans published in 2017 and 2021 together provide a structured framework, updated sectoral strategies, and indicative investment requirements, giving Hong Kong a coherent long-term strategic direction.

A major strength of Hong Kong's approach is its continuity across administrations. This stability is supported by Hong Kong's executive-led system, which traditionally allows major policy directions to be carried forward across leadership transitions. Another strength is Hong Kong's expected alignment with Mainland policy evolution, particularly through the GBA's growing emphasis on clean energy, innovation, and green finance. As China accelerates clean energy deployment and regional power system reform, Hong Kong's ability to anchor its long-term pathway within a neighbouring region undergoing rapid transformation offers opportunities for deeper integration of zero-carbon electricity, enhanced resilience, and access to broader pools of green finance. This alignment

reinforces the credibility of Hong Kong's 2050 pathway, especially given that electricity generation remains the city's dominant source of emissions (although Hong Kong itself has a major interest in saving energy).

At the same time that Hong Kong has set long-term targets, structural challenges remain around their feasibility. Realising long-term targets depends heavily on sustained political attention, effective cross-government coordination, and strong engagement with businesses and the public, as well as constructive cooperation with counterparts in the GBA and nationally. Ambitious and well-designed policies are required across all major emitting sectors – electricity and energy, buildings, transport, and waste – to ensure that Hong Kong remains on a credible pathway toward its 2035 and 2050 goals.

Hong Kong's long-term strategy must also navigate developments arising from regional electricity systems, infrastructure investment, and cross-boundary cooperation. While these interdependencies offer significant advantages, they also entail exposure to factors outside Hong Kong's direct control, including the pace of regional power-market reforms, regional clean-energy availability, and other relevant national policies. The HKSAR Government therefore needs to remain highly attuned to national and regional policy developments, as well as invest in building the administrative and market-oriented capabilities required to identify and capture opportunities for Hong Kong emerging from the GBA and broader national transition.

Overall, Hong Kong has established a credible long-term vision that is coherent with both global benchmarks and China's national direction. Its principal strengths lie in policy continuity, regional alignment, and increasingly mature sectoral strategies. To strengthen Pillar 1 further, Hong Kong could consider developing clearer interim milestones and improve progress tracking. Strengthening Pillar 1 is therefore less about redefining ambition than about reinforcing the institutional mechanisms needed to sustain delivery over the coming decades.

ENDNOTES

1. Environment Bureau. (2010). *Hong Kong's Climate Change Strategy and Action Agenda – Consultation Document*. HKSAR Government.
2. The Fukushima accident of 2011 resulted in the meltdown of three nuclear reactors at Japan's Fukushima Daiichi plant after a massive earthquake and tsunami, causing widespread radioactive releases and prompting a global reassessment of nuclear energy safety.
3. People's Bank of China, Ministry of Finance, National Development and Reform Commission, Ministry of Environmental Protection, China Banking Regulatory Commission, China Securities Regulatory Commission, & China Insurance Regulatory Commission. (2016). *Guidelines for Establishing the Green Financial System*. Government of the People's Republic of China.
4. Environment Bureau. (2015). *Hong Kong Climate Change Report 2015*. HKSAR Government. <https://www.eeb.gov.hk/sites/default/files/pdf/ClimateChangeEng.pdf>.
5. Hong Kong's sectoral energy saving efforts were underpinned by the *Energy Saving Plan 2012-2015* and its successor, the *Energy Saving Plan for Hong Kong 2015-2025+*, which set the target of reducing energy intensity by 40% by 2025. Environment Bureau & Electrical and Mechanical Services Department. (2015). *Energy Saving Plan for Hong Kong 2015-2025+*. HKSAR Government. <https://www.eeb.gov.hk/sites/default/files/pdf/EnergySavingPlanEn.pdf>.
6. Environment Bureau. (2017, January). *Deepening Energy Saving in Existing Buildings*. Hong Kong: HKSAR Government. https://www.hkgbc.org.hk/eng/engagement/file/EnergySaving_EB_EN.pdf.
7. Environment Bureau. (2016). *Hong Kong Biodiversity Strategy and Action Plan 2016-2021*. HKSAR Government. https://www.afcd.gov.hk/english/conservation/Con_hkbsap/bsap2016/files/HKBSAP16-21_E.pdf.

HONG KONG PILLAR 2: HIGH-LEVEL POLITICAL LEADERSHIP AND WHOLE-OF-GOVERNMENT COORDINATION

I. INTRODUCTION

Hong Kong's climate governance architecture does not exist as a standalone, climate-specific structure; rather, it is embedded within the broader government machinery that makes public policy decisions across all domains. Much of this machinery is rooted in structural features inherited from colonial administration – centralised authority, a strong and hierarchical civil service, and policy formulation driven primarily by professional administrators. Although the political environment and constitutional arrangements changed after 1997, the basic organisational logic of the administration has remained largely intact.

This continuity matters for climate governance because the same administrative DNA shapes how Hong Kong sets climate strategy, coordinates across bureaucracy, manages technical departments, allocates responsibilities, and maintains administrative accountability. The Five Pillars of Climate Governance framework rests directly on this institutional foundation. Thus, understanding Hong Kong's structural inheritance helps explain both its strengths – professionalism, stability, administrative capacity – and its constraints, especially siloed departments and limited institutional mechanisms for horizontal coordination.⁸

A central feature of this inherited machinery is what observers describe as a “disarticulated” administrative system, one in which bureaux and departments operate effectively within their own vertical structures but are only loosely connected horizontally.

Coordination across policy domains relies on ad hoc committees, coordination bodies and senior-level direction rather than built-in structural integration. This pattern of disarticulation has important implications for climate governance, given that climate change, biodiversity, energy, land use planning, transport, buildings, waste management, and climate and nature-based finance span across multiple portfolios. Hong Kong's climate architecture therefore depends heavily on high-level and departmental coordination mechanisms designed to bridge these silos.⁹

This chapter examines how Hong Kong's governance system is organised, how responsibilities are distributed across bureaux and departments, and how coordination mechanisms seek to overcome longstanding structural fragmentation. Although the architecture reflects Hong Kong's administrative heritage, the HKSAR Government has taken significant steps to adapt its institutions to the demands of contemporary climate governance.

II. INSTITUTIONAL ARCHITECTURE MATTERS FOR CLIMATE GOVERNANCE

Hong Kong's governance is led by the Chief Executive, and supported by the two highest-ranking political appointees:

- the **Chief Secretary**,¹⁰ who supervises bureaux dealing with social policy, environment, labour, health, and security; and
- the **Financial Secretary**, who oversees economic and market-facing portfolios such as finance, commerce, economic development, and innovation.

This dual split of responsibilities makes sense if seen from the vertical domain of portfolios. However, climate policy cuts across both clusters. Decarbonisation requires environmental regulation, labour practices, and public health arrangements (part of the Chief Secretary cluster), while financial system alignment, public works, logistics and port and airport policy, and economic transition fall within the Financial Secretary cluster.¹¹

Box 5A provides a brief history of government structure reorganisation since 1997 and Figure 5.1 provides the split of policy clusters between the Chief Secretary and Financial Secretary.

BOX 5A

Post-1997 Government Reorganisation

During British rule, Hong Kong operated a highly centralised, executive-led colonial administration characterised by a governor holding consolidated executive authority; an Executive Council advising the governor; a professional, hierarchical civil service as the primary policymaking and implementation engine; policy branches and departments organised vertically; and a legislature with limited powers.

This administrative model prioritised stability, bureaucratic professionalism, and technocratic governance. Policymaking authority substantially rested with the senior-most civil servants under the governor’s direction. These structural features form the institutional DNA that still shapes policymaking today.

With the establishment of the HKSAR in 1997, the governance architecture evolved but retained its executive-led structure under the Basic Law. Several reform waves reshaped how policies, including climate policies, were formulated and coordinated.

C.H. Tung Administration (1997-2005): Institutional reform

A major institutional reform in 2002 was the introduction of the Principal Officials Accountability System (POAS), which reshaped Hong Kong’s governance architecture. The reform clarified the division between political leadership and civil service administration: Secretaries became political appointees responsible for setting policy direction and accountable to the Chief Executive, while Permanent Secretaries assumed the role of administrative heads,

leading the professional civil service and overseeing policy implementation. This reform marked a departure from the earlier arrangement under which senior civil servants held both policymaking and administrative authority and established a more explicit ministerial model.

The POAS also altered longstanding expectations about the relationship between political leaders and the civil service. Political appointees were now clearly positioned as the final decision-makers, while civil servants were recast as professional administrators providing continuity and expertise. This division of roles remains a defining feature of Hong Kong’s governance system today and continues to shape how policies, including climate policy, are formulated, coordinated, and implemented.¹²

In the environmental portfolio, however, the reform created a significant structural controversy. Traditionally, the Director of Environmental Protection (DEP) was a professionally qualified officer with deep technical knowledge and served as the authoritative head of the Environmental Protection Department (EPD). Under the reorganisation, the DEP position was merged with the Permanent Secretary post, meaning that a career administrator who did not necessarily possess environmental expertise became both the Environment Bureau’s administrative head and the professional head of environmental regulation. This effectively de-professionalised the top environmental regulatory role, weakening the clear separation between technical expertise and administrative management that had previously existed. *(See below for discussion of the reinstatement of the DEP role under the 2022 government restructuring.)*

Donald Tsang Administration (2005-2012): Expansion of political appointees and elevation as a strategic issue

The role and number of political appointees expanded under the Donald Tsang Administration, creating the roles of Undersecretaries and Political Assistants under the Secretaries, aiming to increase responsiveness and political steering. Importantly for climate governance, the government first began to treat climate change as a strategic issue, as noted in Chapter 4, with the issuance of *Hong Kong’s Climate Change Strategy and Action Agenda* in 2010 and the commissioning of climate studies.

C.Y. Leung Administration (2012-2017): Early climate institutionalisation

During the C.Y. Leung administration, Hong Kong’s climate governance began to take on a more structured and coordinated form. This period saw the publication of the *Hong Kong Climate Change Report 2015*, as noted in Chapter 4, the first comprehensive government assessment of climate risks, emissions trends, and required mitigation and adaptation actions. The report was issued ahead of COP21 in 2015 and positioned Hong Kong to articulate a long-term approach aligned with emerging global commitments. Building on this foundation, the government released the *CAP2030+* in early 2017, which set clearer sectoral targets, outlined decarbonisation pathways, and signalled the need for whole-of-government coordination. The HKSAR Government also issued Hong Kong’s first BSAP in 2016, highlighting the importance of biodiversity.

It was also under Leung that the institutional architecture for climate governance was strengthened. The Steering Committee on Climate Change

was established in 2016, chaired by the Chief Secretary, to provide senior-level oversight and ensure cross-bureau integration of climate policies.¹³ Under this framework, the Civil Engineering and Development Department (CEDD), under the Development Bureau (DEVB), created the Inter-departmental Working Group on Climate Change as a dedicated working group within the works departments, embedding climate considerations more deeply into Hong Kong’s infrastructure planning.¹⁴

These developments marked an important shift: climate policy was no longer confined to a single bureau but began to be recognised as a cross-government priority requiring coordinated leadership and technical expertise.

Carrie Lam Administration (2017-2022): Cross-government climate coordination

Despite the political disruptions of 2019 and the public health pressures of the COVID-19 pandemic period (2020-2022), the Lam administration made several important advances in Hong Kong’s climate governance. The government released the *CAP2050* in 2021, which for the first time set a clear long-term commitment for the HKSAR to strive for carbon neutrality before 2050. The plan strengthened sectoral pathways, identified major investment needs, and provided the most comprehensive climate strategy Hong Kong had produced to date.

Institutionally, this period also saw a further elevation of climate leadership within government. The Steering Committee on Climate Change and Carbon Neutrality (SCCCN),¹⁵ the successor to an earlier cross-bureau committee, was reconstituted in 2021 with the Chief Executive as its chair, replacing the Chief Secretary. This

change signalled a recognition that achieving carbon neutrality required top-level political direction and whole-of-government coordination, aligning climate governance more closely with the administration’s strategic priorities.

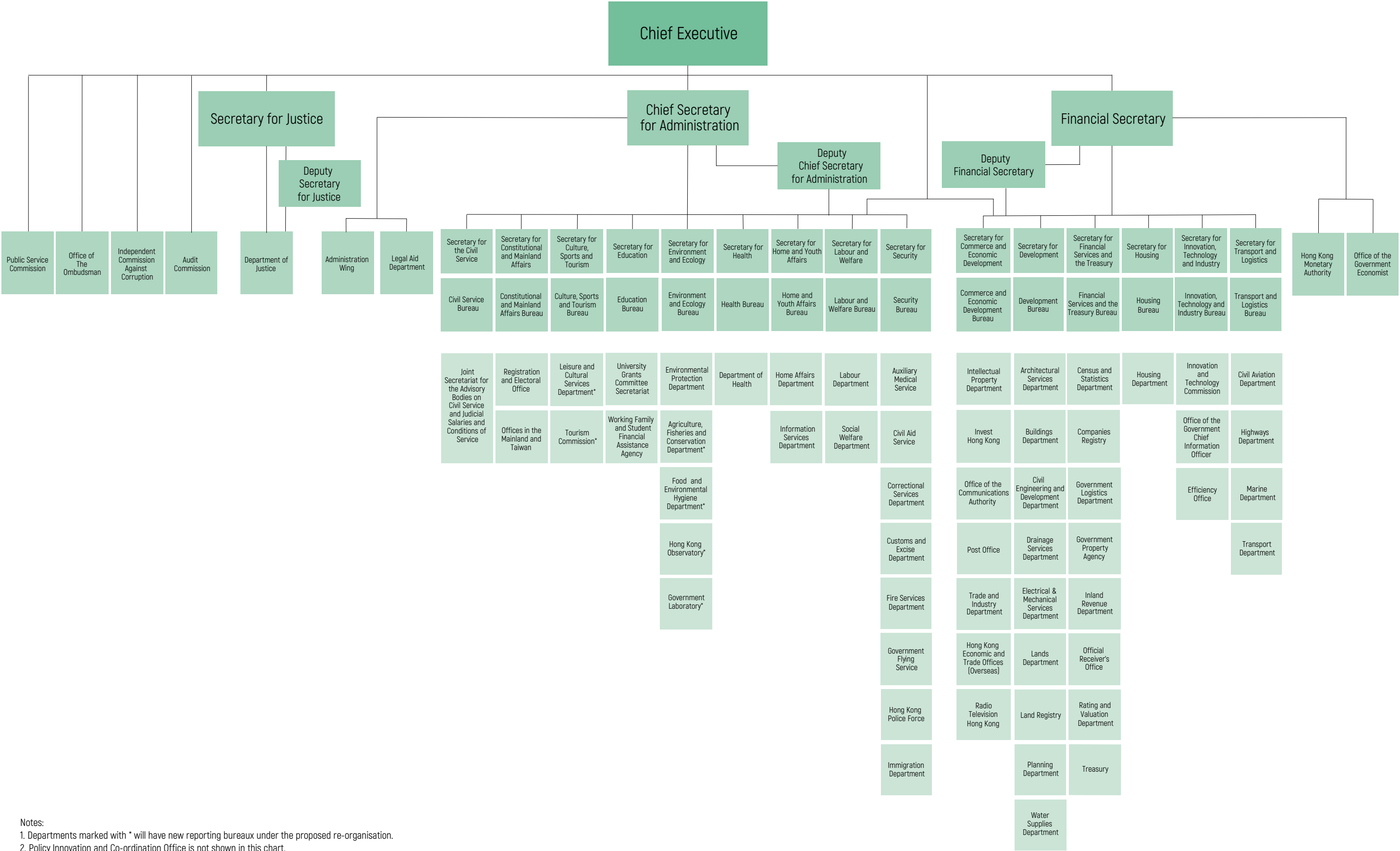
These developments marked an important step toward embedding climate change as a long-term policy commitment, even during a period when the government’s attention was necessarily occupied with other major challenges.

John Lee Administration (2022-present): Major government restructuring

The Lee Administration implemented one of the most significant reorganisations of the HKSAR Government since 1997, with direct implications for climate and environmental governance. The reorganisation expanded the number of bureaux and created new senior posts to strengthen cross-government coordination, including the positions of Deputy Chief Secretary and Deputy Financial Secretary, both relevant to climate policy given its horizontal, economy-wide nature.

A major institutional development was the transformation of the former Environment Bureau into the Environment and Ecology Bureau (EEB). The new bureau consolidated portfolios relating to environmental protection, climate change, energy, biodiversity, food safety, and sanitation, signalling a more integrated approach to ecological and climate governance. Within this framework, the government established the Office of Climate Change and Carbon Neutrality (OCCN), led by the newly created post of Commissioner for Climate Change, to provide dedicated internal capacity and coordination for Hong Kong’s long-term decarbonisation strategy.¹⁶

FIGURE 5.1: Bureaux under the Chief Secretary and Financial Secretary Clusters



III. CLIMATE-SPECIFIC LEADERSHIP AND COORDINATION MECHANISMS

Given the cross-cutting nature of climate change, Hong Kong has developed a set of leadership and coordination mechanisms to integrate work across its vertically organised administrative system. These institutions and offices provide strategic direction, coherence, and oversight across multiple bureaux.

1. Steering Committee on Climate Change and Carbon Neutrality (SCCCN) and the Commissioner for Climate Change

The SCCCN provides whole-of-government coordination for climate strategy, supported by

interdepartmental groups on mitigation, adaptation, resilience, and green finance. The committee's role is especially important in a system where horizontal integration is not structurally embedded. Members are the secretaries of bureaux or their representatives.

In a role established in 2022 within the EEB, the Commissioner for Climate Change leads climate strategy development, cross-bureau coordination, and stakeholder engagement. The Office of Climate Change and Carbon Neutrality (OCCN) supports monitoring and implementation of decarbonisation initiatives.

BOX 5B

The Commissioner for Climate Change

As part of the 2022 government reorganisation, the position of Commissioner for Climate Change was created, and the role is supported by the newly established OCCN within the EEB. This represented a major enhancement of Hong Kong's climate governance architecture, charging a dedicated senior official with driving the city's long-term decarbonisation agenda.

Key features of the Commissioner's role include:

- **Strategic leadership and coordination across the whole government**
The Commissioner is responsible for supporting the formulation, coordination, and implementation of strategies to achieve carbon neutrality, working horizontally across bureaux and departments to ensure alignment with Hong Kong's 2050 target.
- **Oversight of sectoral pathways and progress monitoring**
The role involves tracking overall

emissions trends, evaluating progress on sectoral transition pathways, and identifying gaps requiring policy or regulatory intervention. This monitoring function is meant to enhance internal accountability and supports decision-making.

- **Support for major climate policy instruments**
The Commissioner plays a central role in developing and updating climate action plans, shaping regulatory proposals, and supporting the government's long-term investment planning for decarbonisation. The post therefore helps anchor climate policy within a structured, forward-looking framework.
- **Engagement with external stakeholders and international partners**
The Commissioner is tasked with coordinating engagement across industry, academia, NGOs, and financial regulators, and representing

Hong Kong in relevant regional and international dialogues. This improves coherence between domestic policy and global climate governance trends.

- **Institutionalising climate governance as an administrative function**
By placing the Commissioner at a senior level within the EEB, the government signalled that climate governance is not merely an environmental issue but a strategic, cross-government priority requiring dedicated leadership, permanent secretariat support, and structured coordination mechanisms.

The creation of the Commissioner for Climate Change role establishes a clear focal point for climate leadership within the administration, the purpose of which is to strengthen the government's capacity to integrate climate considerations across policy domains and provide an institutional mechanism to steer Hong Kong's decarbonisation pathway over multiple decades.

2. Reinstated Director of Environmental Protection (DEP)

The 2022 restructuring restored the DEP as a professional head of the Environmental Protection Department (EPD), reversing the 2002 merger that had combined the professional regulatory role with the administrative Permanent Secretary post. This reinstatement strengthens regulatory leadership and technical oversight.

BOX 5C

Professional Leadership Matters – DEP's Role

The 2022 reorganisation under the Lee Administration made a pivotal structural change: it reinstated the DEP as a distinct, professionally qualified post. The decision for reinstatement had already been decided in the previous administration. This reversed the 2002 merger that had combined the DEP with the Permanent Secretary, effectively removing the city's professional head of environmental regulation.¹⁷

Key features of reinstating the DEP role include:

- **Restoration of professional leadership**
The DEP is again a professionally qualified officer who serves as the authoritative head of the EPD. This

addresses longstanding concerns that the previous structure resulted in leadership that lacked the technical expertise required for complex regulatory oversight.

- **Clear separation of policy and regulation**

Under the 2022 reforms, the Permanent Secretary for the Environment and Ecology focuses on high-level policy formulation, including on climate change, while the DEP leads operational and regulatory functions within EPD.

- **Strengthened capacity for environmental and climate governance**

The structural separation between policymaking and professional

regulation provides clearer lines of accountability, enhances technical credibility, and better equips Hong Kong to manage increasingly complex environmental responsibilities.

By reinstating the DEP, the government reintroduced the professional leadership essential for robust environmental regulation. This change is a critical component of Hong Kong's climate governance architecture today, underpinning both policy execution and the credibility of regulatory decisions.

IV. CORE BUREAUX AND DEPARTMENTS IN CLIMATE GOVERNANCE

Given the cross-cutting nature of climate governance, the associated functions are spread across bureaux and departments, presented below as functional clusters.

1. Environment, energy & ecology cluster (EEB)

EEB is the central policy authority for climate mitigation, environmental protection, ecology, energy efficiency, and sanitation. Its departments include:

- **Environmental Protection Department (EPD):** air quality, waste, pollution control, environmental impact assessment, carbon monitoring

- **Electrical and Mechanical Services Department (EMSD):** energy efficiency regulation, building energy codes, public-sector decarbonisation
- **Agriculture, Fisheries and Conservation Department (AFCD):** biodiversity, marine and terrestrial conservation, nature-based solutions
- **Food and Environmental Hygiene Department (FEHD):** sanitation, waste removal, public hygiene during climate-related extreme events
- **Hong Kong Observatory (HKO):** meteorology, climate projections, hazard warnings; transferred to EEB in 2022

2. Infrastructure, works and built environment cluster (DEVB)

DEVB oversees land use, urban form, public works, infrastructure and domains with enormous influence on emissions, resource use, and climate adaptation and resilience. Its departments include:

- **Planning Department (PlanD):** land use, zoning, spatial planning
- **Buildings Department (BD):** building control, structural safety, code compliance for new and existing buildings
- **Architectural Services Department (ArchSD):** design and management of public buildings, integrating energy efficiency, low-carbon materials, and resilience
- **Civil Engineering and Development Department (CEDD):** territorial development, coastal works, reclamation, slope safety, climate risk assessment
- **Geotechnical Engineering Office (GEO):** landslip risk management, extreme rainfall modelling
- **Drainage Services Department (DSD):** flood control, stormwater management, blue-green infrastructure
- **Water Supplies Department (WSD):** potable water, desalination, leakage control, drought resilience

3. Mobility and logistics cluster (TLB)

The Transport and Logistics Bureau (TLB) governs land, sea, and air transport, which are key emissions sources. Its departments include:

- **Transport Department (TD):** road transport planning, vehicle regulation, traffic management, and EV-charging network development
- **Highways Department (HyD):** planning, designing, and maintenance of road and railway infrastructure. Its Railway Development Office (RDO) manages new rail projects. Because the government is the majority shareholder of the MTR Corporation, HyD and RDO work closely with MTR Corporation on the electrified rail network, the backbone of Hong Kong's low-carbon mobility system

- **Aviation and Airport Affairs:** aviation policy and coordination with the Airport Authority Hong Kong, which manages airport operations and infrastructure with emerging sustainability goals such as sustainable aviation fuels (SAF) readiness
- **Marine Department (MD):** port operations, vessel regulation, shipping decarbonisation pilots, and Hong Kong's interface with IMO requirements

4. Human systems and resilience cluster

Climate-related health and extreme weather disasters heighten the importance of this cluster in adaptation planning.

- **Health Bureau (HB) and Department of Health (DH):** climate impacts on health, including heat stress, air pollution, climate-sensitive diseases and integration of climate projections into health-service planning and risk communication
- **Security Bureau (SB):** emergency preparedness, disaster response, and public safety through the Fire Services Department (FSD), Hong Kong Police, Civil Aid Service, and Government Flying Service

5. Finance and economic cluster

Climate governance increasingly depends on the financial system, requiring consistent standards across banking, securities, insurance, pensions, and public finance. The Green and Sustainable Finance Cross-Agency Steering Group (CASG), led jointly by the Hong Kong Monetary Authority (HKMA) – the city's central bank – and the Securities and Futures Commission (SFC), brings together all major financial regulators, the Financial Services and the Treasury Bureau (FSTB), and EEB. FSTB plays a central role as the policy bureau responsible for Hong Kong's financial services development, financial market regulation, and sustainability-related disclosure and taxonomy initiatives.

BOX 5D

The Green and Sustainable Finance Cross-Agency Steering Group (CASG)

Hong Kong's financial regulators created the CASG in May 2020 to coordinate the city's regulatory approach to climate-related financial risks and to position Hong Kong as a leading centre for green finance in Asia. Established jointly by the HKMA and SFC, the CASG brings together all key financial regulators whose mandates intersect with climate-related financial disclosure, prudential supervision, market development, and transition finance.

The Cross-Agency Steering Group consists of the heads or senior representatives of:

- Hong Kong Monetary Authority (HKMA)
- Securities and Futures Commission (SFC)
- Insurance Authority (IA)
- Mandatory Provident Fund Schemes Authority (MPFA)
- Financial Services and the Treasury Bureau (FSTB)

- Environment and Ecology Bureau (EEB) – joined in 2021 to strengthen alignment between climate policy and financial regulation
- Hong Kong Exchanges and Clearing Limited (HKEX) – joined in 2021 to support listing rule reform and climate disclosure requirements
- Accounting and Financial Reporting Council (AFRC)

This composition is the only mechanism in Hong Kong that unites monetary, banking, securities, insurance, pensions, and environmental policy authorities under a single climate-finance coordination framework. Its core mandate is to accelerate the development of green and sustainable finance and to ensure that the financial system can support, and remain resilient to, Hong Kong's transition to carbon neutrality. Its functions include:

- Aligning regulatory expectations on climate-related risk management across the banking, insurance, Mandatory Provident Fund, and securities sectors

- Preparing Hong Kong for mandatory climate-related financial disclosure, including the adoption of the ISSB standards across listed companies and financial institutions
- Coordinating supervisory approaches to climate risk, including scenario analysis and stress testing
- Developing market infrastructure such as green taxonomies, transition finance frameworks, and external validation arrangements
- Promoting cross-border cooperation, including with Mainland regulators, to support GBA-wide green finance initiatives
- Supporting capacity-building for industry and aligning finance sector efforts with Hong Kong's *Climate Action Plan 2050*

Since its establishment, the CASG has published multiple progress reports, launched the "carbon markets opportunities" programme, and coordinated the implementation of Hong Kong's sustainability disclosure roadmap.

V. MAINLAND AND GBA INTERFACES

Hong Kong's climate and environmental governance relates to Mainland systems through a set of cross-boundary coordination mechanisms. Given Hong Kong's geographical position within the Pearl River Delta and its deep economic, ecological, and atmospheric linkages with neighbouring cities, regional coordination is an essential component of environmental protection, air quality improvement, marine conservation, and climate adaptation.

Within EEB, a dedicated cross-boundary coordination unit serves as the primary interface with Mainland

authorities and regional environmental bodies. This unit manages institutional links with national ministries and provincial governments and bodies, as well as relevant GBA-level platforms. It also provides policy support for Hong Kong's participation in regional environmental agreements, technical studies, and joint monitoring programmes.

Climate-related cooperation with the Mainland and the GBA takes several forms. Hong Kong and Guangdong Province jointly operate long-running air quality monitoring and management frameworks, including shared emission inventories and

coordinated control measures that have contributed to sustained improvements in regional air quality. In the marine domain, Hong Kong collaborates with Mainland agencies on marine water quality, fisheries management, biodiversity conservation, and marine litter reduction, supporting broader ecological connectivity in the GBA.

Scientific collaboration also plays a growing role. HKO works with Mainland meteorological authorities on data sharing, climate projections, typhoon research, and extreme weather early warning systems, an increasingly important domain as climate hazards intensify across the region. In addition, discussions are held on emerging areas that could support

longer-term decarbonisation, such as clean energy cooperation, hydrogen readiness, and cross-border electricity infrastructure.

These cross-boundary interfaces complement Hong Kong’s domestic climate architecture by situating local action within a broader regional system. Because air quality, marine ecosystems, and weather patterns transcend administrative boundaries, cooperation with Guangdong Province and the GBA strengthens the scientific, regulatory, and operational foundations of Hong Kong’s environmental and climate governance. The cross-boundary unit within EEB ensures that this cooperation is structured, continuous, and aligned with Hong Kong’s policy priorities.

BOX 5E
Cross-Boundary Cooperation Mechanisms

Hong Kong participates in several formal cross-boundary mechanisms that connect its climate, environmental, marine, and meteorological systems with those of Guangdong Province and the GBA. These longstanding frameworks support data sharing, joint planning, and coordinated action across atmospheric, marine, and ecological domains. EEB’s Cross-Boundary Coordination Unit manages Hong Kong’s engagement with Mainland ministries and GBA platforms, ensuring regular communication and policy alignment.

These mechanisms embed Hong Kong’s environmental and climate governance within a broader regional ecosystem, strengthening scientific collaboration, hazard management, and ecological restoration across the GBA.

1. Regional Climate and Meteorological Cooperation	Hong Kong Observatory collaboration with the China Meteorological Administration and Guangdong Meteorological Bureau: Longstanding cooperation established prior to 1997 that supports climate-data exchange, typhoon research, and extreme-weather early warning ¹⁸
2. Environmental & Sustainable Development Coordination	Hong Kong-Guangdong Joint Working Group on Sustainable Development and Environmental Protection (2000s): Covers marine water quality, cross-boundary pollution control, ecological conservation, and environmental management. ¹⁹
3. Air Quality Management	Guangdong-Hong Kong-Macao Pearl River Delta Regional Air Quality Monitoring Network (2005): Joint monitoring of regional pollution trends and emissions inventories. ²⁰
4. Marine Ecology and Coastal Protection	Hong Kong-Guangdong Marine Environmental Management Special Panel (Mid-2010s): Coordinates coastal ecology, red-tide monitoring, and marine-litter reduction. ²¹
5. Regional Planning	Outline Development Plan for the Guangdong-Hong Kong-Macao Greater Bay Area (2019): Provides the policy framework for cross-boundary ecological conservation, marine governance, environmental cooperation, and disaster-risk management. ²²

The effectiveness of this institutional architecture ultimately depends on how well coordination mechanisms operate in practice, an issue examined in the following chapters on policy integration, transparency, and stakeholder engagement.

ENDNOTES

8. For a comprehensive analysis of Hong Kong's administrative system and its historical evolution, see Scott, I. (2022). *The public sector in Hong Kong (2nd ed.)*. Hong Kong University Press. Scott argues that many features of the contemporary Hong Kong government remain deeply rooted in its colonial administrative inheritance. These include a centralised, executive-led system, a hierarchical and professionally staffed civil service, a longstanding emphasis on policy stability, fiscal conservatism, and bureaucratic neutrality, and a structural reliance on senior civil servants to formulate and implement policy. He notes that, although the political and constitutional environment changed substantially after 1997, the organisational logic and operational practices of the public sector have shown remarkable continuity. Scott also highlights the persistence of departmental silos, vertical lines of authority, and a generally incremental approach to reform. These characteristics continue to shape how public policy is coordinated and delivered across Bureaux and Departments in the HKSAR today.
9. For further discussion of Hong Kong's administrative structure, see Scott, I. (2022). *The public sector in Hong Kong (2nd ed.)*. Hong Kong University Press. Scott describes Hong Kong's system as "disarticulated", a term he uses to characterise a government that is vertically strong within individual bureaux and departments but weakly integrated horizontally. He notes that Hong Kong's administrative machinery historically evolved around self-contained departmental silos, each with its own professional culture, hierarchy, and operational routines, but without robust institutionalised mechanisms for cross-sectoral coordination. As a result, policy integration often depends on ad hoc committees, steering groups, and senior-level directives, rather than on structural linkages built into the system. Scott emphasises that this pattern is not a product of post-1997 changes but a longstanding organisational feature inherited from colonial administration.
10. The formal title of the post is the *Chief Secretary for Administration*, the most senior Principal Official after the Chief Executive. Under Article 53 of the Basic Law, the Chief Secretary for Administration assumes the duties of the Chief Executive when the latter is absent from Hong Kong or unable to discharge his or her functions.
11. The distribution of Bureaux under the Chief Secretary and Financial Secretary is defined in the Government's 2022 reorganisation proposals. See Constitutional and Mainland Affairs Bureau & Policy Innovation and Co-ordination Office. (2022, May 17). *Legislative Council Brief: Re-organisation of the government structure for the sixth-term government*. The document details the post-2022 clustering of policy bureaux into two principal groups under the Chief Secretary and the Financial Secretary respectively. https://www.legco.gov.hk/yr2022/english/brief/picocr654c_20220517-e.pdf.
12. For discussions about the POAS, see Burns, J. P., Li, W., & Peters, B. G. (2013). *Changing governance structures and the evolution of public service bargains in Hong Kong*. *International Review of Administrative Sciences*, 79(1), 131-148. Using the concept of "public-service bargains," the authors analyse how Hong Kong's shift from a civil-service-led administrative state to a more politically responsive ministerial system disrupted established relationships between civil servants and political leaders. They argue that changes in governance structure introduced instability and ambiguity into the roles, responsibilities, and expectations of senior civil servants.
13. The Steering Committee on Climate Change was established in 2015 under the Chief Secretary as Hong Kong's first high-level mechanism for coordinating climate-related policies across bureaux. Its creation and remit were outlined in the *Hong Kong Climate Change Report 2015* (Government of the HKSAR, 2015). <https://www.eeb.gov.hk/sites/default/files/pdf/ClimateChangeEng.pdf>.
14. Ibid.
15. Government of the Hong Kong Special Administrative Region. (2021). *Hong Kong's Climate Action Plan 2050: Towards Carbon Neutrality*. Environment Bureau. https://cnsd.gov.hk/wp-content/uploads/pdf/CAP2050_booklet_en.pdf.
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21. Constitutional and Mainland Affairs Bureau. "Environmental Protection and Sustainable Development". Greater Bay Area. <https://www.bayarea.gov.hk/en/opportunities/environmental.html>.
22. The Mainland's *Outline Development Plan for the Guangdong-Hong Kong-Macao Greater Bay Area* (2019) provides the overarching framework for regional cooperation on ecological conservation, marine governance, environmental protection, disaster-risk management, and sustainable development across the GBA. It formalises and expands many cross-boundary mechanisms that had been operating for years between Hong Kong and Guangdong. National Development and Reform Commission. (2019). *Outline Development Plan for the Guangdong-Hong Kong-Macao Greater Bay Area*. People's Republic of China.

HONG KONG PILLAR 3: INTEGRATION ACROSS ALL POLICY SECTORS (“MAINSTREAMING”)

I. INTRODUCTION

Without systematic integration across policy sectors, climate targets risk being implemented unevenly, inconsistently, or too slowly to meet long-term objectives.

Mainstreaming is foundational for climate governance

Mainstreaming refers to the systematic integration of climate considerations into the policies, plans, and decision-making processes of all government sectors – not only those traditionally associated with environmental protection. It is a foundational concept in contemporary governance because climate change shapes, and is shaped by, nearly every domain of public administration.

Global experience shows that effective climate action depends not only on strong climate policies but on the degree to which climate objectives are embedded across the machinery of government. The IPCC’s Sixth Assessment Report underscores that mitigation and adaptation pathways require coordinated policies across land-use, energy, buildings, transport, and finance, noting that fragmented sectoral approaches produce slower emissions reductions and higher long-term costs.²³ The UNFCCC’s enhanced transparency and national planning frameworks similarly emphasise cross-sectoral alignment as essential for implementing the Paris Agreement.²⁴ Development institutions such as the OECD and World Bank consistently highlight that whole-of-government integration is one of the strongest predictors of policy effectiveness.²⁵ Refer to Pack One Chapter 3 for further discussion of the global consensus on good climate governance.

The logic is straightforward. Decarbonisation alters how cities grow, how buildings are designed and managed, how mobility is organised, and how infrastructure is financed and operated. Adaptation demands coordinated planning for extreme precipitation, flood and landslide risks, heat resilience, water security, and biodiversity, all of which cross traditional administrative boundaries. Mainstreaming therefore ensures that climate goals are not confined to a single policy domain or department but guide priorities, budgets, and regulatory decisions across government. In the absence of such integration, governments may develop strong climate strategies on paper but remain unable to translate them into coherent, system-wide action. This chapter examines the importance of mainstreaming as a governance principle, surveys international approaches, and assesses Hong Kong’s progress and ongoing challenges.

II. DEFINING MAINSTREAMING: OPERATIONAL REQUIREMENTS

Outside of a governance context, mainstreaming refers to the process of embedding climate objectives and risk considerations into the core decision-making frameworks of private sector entities, financial institutions, and industry standards. Ultimately, it is the integration of climate from a standalone issue into the fundamental logic of how organisations operate and create value; in the context of climate governance, that organisation is the government.

International experience shows that mainstreaming of climate governance is not an abstract principle but a set of concrete operational practices. Drawing on the global frameworks and analyses referred to above, effective mainstreaming requires governments to:

- **Integrate climate objectives across all policy domains**, ensuring that mitigation, adaptation and resilience considerations inform strategies across all major policy domains and public-sector functions.
- **Coordinate policymaking early in the design process**, so that climate considerations shape the formulation of policies, regulations, and investments rather than being appended at a later stage. This upstream integration is emphasised in both the Paris Agreement’s planning requirements and the IPCC’s governance assessments.
- **Align budgets and financial frameworks with climate goals**, ensuring that resource allocation, investment planning, and financial incentives reinforce and enable sectoral transitions. Development institutions highlight this as essential for shifting capital flows toward low-carbon and resilient infrastructure.
- **Recognise and manage interdependencies between sectors**, such as the links between building energy performance and electricity system planning, or between land-use decisions, mobility patterns, and emissions trajectories. The IPCC stresses that coordinated action across systems reduces long-term costs and avoids contradictory outcomes.
- **Engage non-governmental actors**, including utilities, regulators, industry associations, professional bodies, financial institutions, and civil society, to ensure that mainstreaming extends beyond the public sector. Both OECD and World Bank analyses emphasise that whole-of-society participation is critical for successful implementation.

Taken together, these requirements underscore that climate objectives become operational only when governments integrate them systematically across policies, institutions, financing structures, and partnerships. Mainstreaming therefore ensures that climate action becomes a core component of routine governance rather than a specialised, isolated domain.

III. INTERNATIONAL EXPERIENCE: COMMON PATTERNS AND LESSONS

International practice shows clearly that mainstreaming is indispensable for effective climate governance. Jurisdictions that integrate climate considerations across various domains are more likely to maintain coherent trajectories and avoid contradictory policy signals. As outlined in Pack One Chapter 2, different governance systems around the world have adopted different institutional tools to achieve this, reflecting their political and administrative traditions.

Across jurisdictions, mainstreaming has emerged as a critical enabler of effective climate action. These general patterns are visible in concrete institutional designs. As shown in Pack One Chapter 2, the United Kingdom operationalises mainstreaming through the Climate Change Act (CCA) and its legally binding carbon budget system, which encourages cross-government alignment by linking all sectors, including energy, buildings, transport, industry, land use, and finance to a single statutory emissions pathway. Singapore, by contrast, achieves mainstreaming through a unified planning and regulatory model, with the Green Mark system functioning as a comprehensive built environment governance mechanism that integrates climate and sustainability considerations into planning approvals, building codes, development incentives, and operational performance. These examples illustrate that mainstreaming requires more than coordination; it depends on institutional tools that bind different sectors to a coherent trajectory and centre climate objectives in day-to-day governance.

Taken together, these international examples highlight a key governance lesson: mainstreaming is most effective when anchored in mechanisms that create consistent expectations across sectors and across time. Whether through statutory duties, as in the United Kingdom, or through technocratic planning and integrated regulatory frameworks, as in Singapore, mainstreaming is enabled by durable institutional arrangements that align policies, budgets, and incentives. These comparative insights provide a useful lens for analysing Hong Kong’s governance arrangements and understanding how its efforts at mainstreaming can be improved.

IV. HONG KONG’S EXPERIENCE WITH MAINSTREAMING

Although Hong Kong has not adopted a formal, government-wide mainstreaming framework, the concept has surfaced repeatedly across major policy processes, signalling an awareness that climate and environmental considerations must extend beyond the environment portfolio.

These experiences demonstrate that the authorities recognise the need to integrate climate and environmental considerations across different policy domains, even if such integration has not yet become systematic. The BSAP consultation processes in 2016 and 2025, which included not only government but also civil society and academia, represent Hong Kong’s early formal articulation of mainstreaming as a governance principle, even though they focused on biodiversity rather than climate specifically.

Mainstreaming also appears in sectoral strategies associated with decarbonisation. *CAP2050* stresses the importance of integrating climate considerations into infrastructure development, energy planning, and public-sector operations. The creation of the Climate Change Working Group on Infrastructure (CCWGI) and the revision of engineering design standards to incorporate climate projections show that specific departments, particularly works agencies, have begun

integrating climate science into operational practice. These efforts reflect an emerging recognition that adaptation and resilience must be embedded into the policy cycle.

Similarly, governance reforms in 2022 sought to consolidate environment, climate, energy, ecology, and meteorology within the new EEB, with the intent of improving cross-cutting coordination. The institutions outlined in Chapter 5, including OCCN and the Green and Sustainable Finance Cross-Agency Steering Group, were established to strengthen strategic planning, drive internal harmonisation, and integrate climate objectives into the financial system, regulatory requirements, and investment flows.

Overall, these developments show that Hong Kong has articulated mainstreaming principles in domains such as biodiversity, works and infrastructure, and green finance. However, these efforts have largely been sector-specific and departmental rather than part of a comprehensive framework covering all climate-relevant policy areas. They provide an important conceptual foundation, but remain fragmented, stopping short of forming a unified, government-wide mainstreaming system. As such, mainstreaming in Hong Kong remains partial and uneven in practice.

V. HONG KONG: MAINSTREAMING REMAINS PARTIAL AND UNEVEN

Despite clear long-term commitments and a maturing climate governance architecture, Hong Kong’s progress on mainstreaming climate considerations across government remains uneven. Climate action is increasingly recognised as a cross-cutting priority, yet the institutional mechanisms that support sectoral alignment, integrated planning, and coordinated implementation are not fully developed. As a result, climate objectives do not consistently shape policy choices across policy domains.

Several structural factors explain this partial mainstreaming as described below.

Hong Kong’s current system is only partially mainstreamed: climate objectives influence policy in some areas, but not consistently across all sectors or throughout the policy cycle, nor are they strategically reinforcing to create cumulative impact at scale. Deeper and more systematic integration will be essential for Hong Kong to deliver the cross-sectoral transformation required for carbon neutrality by 2050.

VI. STRUCTURAL AND INSTITUTIONAL CONSTRAINTS TO MAINSTREAMING

Despite growing awareness of the need to integrate climate considerations across multiple policy domains, several structural and institutional features of Hong Kong’s governance system constrain the development of a comprehensive mainstreaming framework. These constraints help explain why existing efforts, though meaningful in specific sectors, remain fragmented and uneven.

- **Deep-rooted sectoral silos fragment authority and incentives.** Hong Kong’s administrative system operates through strongly siloed policy portfolios, a tradition reflecting its history of specialised domains. Core climate functions – land use, buildings, transport, energy, and finance – are distributed across separate bureaux and departments with distinct mandates and performance indicators. While EEB provides overall leadership, the most consequential decarbonisation levers sit outside its direct authority. This structure limits the extent to which climate considerations shape upstream decisions and results in parallel sectoral strategies (e.g., the Clean Air Plan, EV Roadmap) that are not embedded within a unified cross-sector planning and budgeting process.²⁶
- **A gap persists between financial innovation and core policy levers.** Although Hong Kong is developing a sophisticated green finance architecture, these tools primarily target the financial sector rather than being directly linked to the decarbonisation and adaptation decisions

of policy bureaux. The city’s fiscal tradition, with its emphasis on conservative spending and market-driven solutions, also makes large-scale public climate investment complex. The result is an advanced financial ecosystem that is not fully harnessed by the policy environment, inhibiting the mobilisation of capital for system-wide projects.

- **Policy legacies and path dependency create an uneven implementation landscape.** Hong Kong’s environmental governance was originally built for pollution control and incremental compliance, with climate action layered on later. Consequently, mainstreaming must compete with long-established administrative routines. This legacy, combined with uneven technical capacity across departments, means integration is advanced in some agencies (e.g., DSD, GEO) but not universal. Actions therefore advance at different speeds, limiting their cumulative, strategically reinforcing effect, as seen in the challenges of building retrofits (Case Study 1) or port decarbonisation (Case Study 3).
- **The private-sector interface adds a layer of complexity to coherence.** Hong Kong’s development model relies heavily on private actors — utilities, developers, building owners, and financial institutions. Mainstreaming thus requires alignment not only within government but also across diverse commercial interests, which have their own fragmented incentives. Without integrated regulatory mandates, standards, and financing frameworks that steer these actors cohesively, sectoral policies can pull in different directions, further diluting systemic impact.

Taken together, these structural and institutional constraints explain why mainstreaming in Hong Kong remains partial. The challenge is not a lack of commitment or recognition, but the absence of durable mechanisms that systematically embed climate considerations into policy formulation, planning, regulation, budgeting, and implementation across all sectors. Strengthening mainstreaming

therefore requires reforms that address these underlying constraints, enabling Hong Kong to move from sector-specific efforts to a coherent, government-wide framework for climate action.

VII. OPPORTUNITIES FOR A MORE INTEGRATED FRAMEWORK FOR HONG KONG

Strengthening mainstreaming in Hong Kong does not necessarily require large-scale institutional restructuring or the enactment of a climate law. Instead, meaningful improvement can occur within the government’s current administrative and political framework by enhancing upstream coordination, embedding climate considerations into established processes, and cultivating a culture of shared responsibility across bureaux and departments.

International experience shows that non-statutory administrative tools, when applied consistently, can achieve high levels of integration, as seen in Singapore, Japan, South Korea, and a range of EU member states. The opportunities outlined below

represent achievable, low-risk steps that build on existing strengths while addressing gaps identified earlier in this chapter.

- **Make climate considerations an upstream requirement in policy formulation and public finance processes:** Hong Kong could introduce a government-wide requirement for bureaux to include a short “Climate Implications Statement” when submitting new policy proposals or funding bids or proposing legislative items or major investment projects. This would bring climate considerations into decision-making at the design stage, rather than being added downstream. Supporting tools, such as Singapore’s environmental sustainability assessments for development or the European Union’s climate-proofing requirements for infrastructure, have proven effective without relying on legislation. For Hong Kong, the key would be operational consistency: ensuring bureaux routinely consider mitigation, adaptation, and resilience impacts when designing policies that affect buildings, transport, land use, and energy demand and have the knowledge and tools to do so.

BOX 6A

International Experience with Upstream Climate Consideration Requirements

Several jurisdictions have introduced administrative tools that require ministries to consider climate impacts at the beginning of the policy cycle, rather than after decisions are set.

Singapore

In Singapore, development and infrastructure proposals submitted to planning authorities must include sustainability assessments, ensuring that energy use, heat impacts, and resource efficiency are addressed upstream.²⁷

Japan

Japan uses Cabinet-led implementation plans, where ministries must demonstrate alignment with national climate and energy directions in their early policy designs.²⁸

European Union

The European Union applies a “climate proofing” obligation for major public investments, requiring an assessment of both mitigation and resilience impacts before funding is approved.²⁹

These tools do not require climate legislation; they operate through standard administrative procedures. Their common function is to normalise climate considerations as a routine component of policymaking across all sectors – an approach that Hong Kong can readily adapt within its existing system.

- **Strengthen the role of the SCCCN:** The terms of reference for the SCCCN could include a mechanism for upstream policy alignment. Within the existing administrative hierarchy, the Chief Secretary can request that bureaux prepare forward-looking climate priorities aligned with broader government objectives, and the SCCCN can review these priorities on a periodic basis. This would gradually shift the committee from an information-sharing, dispute-settlement body to a more strategic forum for ensuring sectoral plans support overall climate goals. Such a role would emulate Japan’s ministerial implementation planning and South Korea’s climate policy coordination structures, which rely on cabinet-level committees to drive alignment without statutory mandates.
- **Introduce a light, non-statutory climate budget tagging system:** Many jurisdictions use budget tagging to identify climate-related expenditures across government. Budget tagging does not allocate funds or impose obligations; rather, it makes visible how resources support climate mitigation, adaptation, and resilience. In Hong Kong, a simple tagging framework, implemented by the Financial Services and the Treasury Bureau, could encourage bureaux to consider whether their spending proposals advance or hinder climate objectives. Budget tagging has been adopted by countries as diverse as South Korea, Indonesia, and France, illustrating its adaptability across governance systems.
- **Embed climate considerations into existing planning, regulatory, and technical instruments:** Hong Kong already employs a rich set of planning mechanisms, technical circulars, and practice notes across works, buildings, and transport. Climate integration could occur through incremental adjustments to these instruments: for example, requiring development-related submissions to include low-carbon design assessments, linking redevelopment incentives

BOX 6B

Strengthening Cross-Government Alignment Through High-Level Committees

High-level committees can facilitate climate mainstreaming when they play a more strategic role than information exchange.

Japan

In Japan, the Global Warming Prevention Headquarters, established under the Cabinet Office, requires that ministries prepare coordinated implementation plans that reflect national climate targets.³⁰

South Korea

South Korea’s Presidential Committee on Carbon Neutrality and Green Growth serves a similar function, issuing integrated five-year action plans and monitoring cross-ministerial alignment.

Neither model depends on statutory enforcement; instead, authority is derived from the entity’s position within the executive hierarchy, enabling it to convene ministries, reconcile policy differences, and set shared expectations. These examples show how Hong Kong’s SCCCN can evolve into a platform that supports upstream alignment and ensures policy coherence across bureaux without institutional restructuring.³¹

BOX 6C

Climate Budget Tagging as a Non-Statutory Integration Tool

Climate budget tagging is increasingly used as a light-touch method to identify climate-related spending across government. South Korea, Indonesia, and France tag elements of their budgets to indicate whether expenditures support mitigation, adaptation, or resilience objectives.³²

The process’s value lies in creating visibility and improving the understanding of whether public spending is aligned with climate priorities. Ministries become more aware of the climate implications of their programmes, finance authorities gain a clearer view of cross-government investment patterns, and central coordination bodies can assess consistency across sectors. Because budget tagging operates entirely through administrative procedure, it can be implemented without legislative change, making it a practical tool for Hong Kong’s existing budgeting system.

with energy efficiency outcomes, or expanding the application of resilience-based engineering standards. Singapore’s experience with integrating climate considerations into building codes, land-use planning, and development incentives demonstrates how effective administrative instruments can be in shaping market practice even without new legislation.

- **Expand and strengthen CCWGI to cover additional climate-relevant policy areas:** CCWGI has already improved the integration of climate science into engineering and infrastructure planning. Its scope could be broadened, within the current institutional framework, to include planning, buildings, energy modelling, or transport, enabling more systematic consideration of low-carbon and resilience objectives during project preparation and prioritisation. Such an expansion would reflect the increasingly cross-cutting nature of climate risks and would create a practical mechanism for technical alignment across bureaux.
- **Provide a Climate Mainstreaming Circular to provide consistent procedural guidance across the civil service:** Hong Kong regularly uses internal circulars to shape administrative practice. A dedicated circular, issued by the Chief Secretary, could define the purpose of mainstreaming, set expectations for policy submissions, clarify data and reporting requirements, and reinforce cross-bureau collaboration. This mirrors approaches in many jurisdictions, where formal administrative directives help ensure consistent practice and signal top-level endorsement without requiring statutory reform.
- **Foster a professional culture that treats climate as a shared responsibility:** Ultimately, stronger mainstreaming depends not only on procedural tools but also on administrative mindset. Bureaux and departments could incorporate climate objectives into their internal performance plans, expand cross-departmental learning on climate data and tools, and strengthen climate capability programmes for policy officers. These steps

BOX 6D

Integrating Climate into Planning, Codes, and Technical Standards

Many jurisdictions reinforce mainstreaming by embedding climate considerations into existing planning and regulatory mechanisms.

- Singapore integrates low-carbon and resilience principles into its building codes, development incentives, and land-use planning processes, ensuring that climate priorities shape design choices in private and public projects.³³
- Australia’s engineering and construction standards incorporate forward-looking climate projections to reduce long-term risks.³⁴
- The Netherlands requires flood resilience to be incorporated into spatial planning guidance.³⁵

These approaches demonstrate that climate integration can occur through incremental adjustments to established instruments, technical circulars, practice notes, engineering manuals, and planning criteria, without introducing new regulatory bodies. Hong Kong’s existing technical and planning architecture provides a strong foundation for adopting similar adjustments tailored to Hong Kong’s local circumstances, as the above countries’ are.

would build on existing efforts by, for example, the Drainage Services Department and the Geotechnical Engineering Office, where climate science is already embedded in routine practice. Encouraging such norms across the wider civil service would help ensure that climate objectives are considered as part of the core mission of each policy area, rather than an external addition driven solely by the EEB.

Countries that have advanced climate mainstreaming emphasise the importance of cultivating climate capability within the civil service. The UK Government issues sustainability guidance for central government departments which requires reporting on greenhouse gas emissions and is introducing new annual reporting

requirements for central government bodies, aligned with the Task Force on Climate Related Financial Disclosures (TCFD) to provide transparency and accountability on climate risk.³⁶ Meanwhile, Singapore invests in the upskilling of officers working on infrastructure, planning, and resource management.³⁷ New Zealand’s Public Service Commission requires agencies to develop climate competencies and offers training programmes to embed climate literacy at multiple levels.³⁸ These initiatives focus on mindset and professional behaviour rather than institutional reform. By strengthening climate awareness and technical understanding among policy officers, governments create a culture in which climate objectives are seen as part of every portfolio’s mission.

Taken together, these adjustments have the potential to provide a feasible, pragmatic blueprint for strengthening climate mainstreaming within Hong Kong’s current governance arrangements. They rely on realistic administrative tools and procedural integration rather than institutional restructuring or legislation. In doing so, they reflect both the limitations and the strengths of Hong Kong’s governance model, offering a pathway toward more coherent and effective whole-of-government climate action.

Effective integration therefore depends not only on coordination mechanisms, but also on clear monitoring, feedback, and review processes, issues examined in the next chapter.

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HONG KONG PILLAR 4: TRANSPARENCY, MONITORING, REPORTING, AND INDEPENDENT REVIEW

I. INTRODUCTION

Core elements of good governance

Transparency, monitoring, reporting, and independent review form the backbone of effective governance in any policy domain. While climate change presents unique challenges, such as multi-sectoral impacts and long-term trajectories, the underlying logic remains the same: governments perform better when decisions, performance, and underlying assumptions are visible, measurable, and open to scrutiny.

Across international governance frameworks, these elements are repeatedly identified as prerequisites for effective government. Article 13 of the Paris Agreement establishes the Enhanced Transparency Framework, emphasising that reliable data, regular progress tracking, and clear communication of policies and measures are essential for delivering national commitments and maintaining international credibility.³⁹ The IPCC's Sixth Assessment Report reinforces this by highlighting that robust monitoring and evaluation systems strengthen mitigation and adaptation pathways by identifying implementation gaps, enabling timely course corrections, and thus reducing long-term transition risks.⁴⁰

Public administration scholarship draws similar conclusions. Transparency reduces information asymmetry between government and society, enabling accountability and strengthening public trust.⁴¹ Monitoring and reporting allow administrations to track progress against objectives, evaluate outcomes, and adjust policies based on evidence rather than assumptions.⁴² Independent review

mitigates inherent biases in self-reporting and provides authoritative assessments that can bridge short-term political pressures and longer-term priorities.⁴³

The core logic is straightforward. When governments make long-term commitments, they require systems that ensure consistency across administrative cycles, enable learning, and maintain credibility with stakeholders. Transparency and monitoring illuminate whether objectives are being met; reporting communicates progress and setbacks; and independent review provides an unbiased assessment that strengthens the integrity of the system.

Applied to climate governance, the importance of these elements becomes even more pronounced. Climate mitigation and adaptation span decades and involve complex interactions across multiple domains. Without robust monitoring and transparency, policy coherence weakens, progress becomes difficult to assess, and implementation gaps widen. Without independent review, governments could risk optimism bias, overestimating the effectiveness of policies or underestimating obstacles.⁴⁴ Conversely, when climate governance incorporates clear reporting and structured scrutiny, it becomes more resilient, adaptive, and credible, and thus better able to mobilise public and private stakeholders.

This chapter examines the role of transparency, monitoring, reporting, and independent review as essential governance functions, surveys international approaches, and evaluates Hong Kong's progress

and challenges. Like Chapter 6 on mainstreaming, the analysis here recognises that Hong Kong need not adopt statutory mechanisms, which would be unrealistic for its context; rather, the question is how its executive-led system can embed transparency and review in ways that enhance climate governance within existing institutional structures.

II. DEFINING TRANSPARENCY, MONITORING, REPORTING, AND INDEPENDENT REVIEW

As noted above, transparency, monitoring, reporting (TMR), and independent review (IR) are not abstract ideals but concrete governance functions that enable governments to implement complex policies effectively. Across domains, these elements work together to ensure that commitments are credible, performance is measurable, and policies evolve through evidence-based learning. In the climate context, these functions are fundamental because long-term decarbonisation and resilience require durable systems for tracking progress across sectors and over decades.

Drawing on global governance frameworks, best practice guidance, and research, an effective TMR and IR system requires governments to:

- **Make information accessible, timely, and decision-relevant:** Transparency begins with the systematic publication of information that allows understanding of government intentions, actions, and outcomes. This includes data on emissions, climate risks, policies and measures, progress indicators, and sectoral trajectories. The OECD highlights that transparency supports accountability only when information is comprehensible, accessible, and tailored to policy and decision-making contexts.⁴⁵
- **Establish consistent monitoring systems and indicators:** Monitoring transforms transparency into actionable governance. It involves the routine collection of data, the use of standardised
- indicators, and the application of consistent methodologies to assess progress over time. Article 13 of the Paris Agreement requires parties to monitor emissions and the impacts of policies and measures through inventory systems and tracking frameworks. The IPCC's governance assessments likewise highlight the importance of harmonised monitoring methodologies to identify implementation gaps, evaluate trends, and ensure comparability across sectors.⁴⁶
- **Produce regular, structured reporting to inform decision-making:** Reporting translates monitoring into a clear assessment of progress, challenges, and next steps. Effective reporting frameworks translate raw data into analysis that informs policymaking, resource allocation, and public communication. International institutions consistently emphasise that reporting must be regular, within government processes, and linked to policy cycles to ensure timely course correction. The Enhanced Transparency Framework of the Paris Agreement requires all parties to provide regular national reports that track progress toward their NDCs and adaptation efforts, reflecting the global expectation that reporting underpins accountability.
- **Incorporate independent review to strengthen credibility and learning:** Independent review introduces an additional layer of oversight that reduces risks of selective reporting and institutional blind spots. It can take many forms, such as statutory bodies, non-statutory advisory committees, external expert assessments, peer review, or commissioned academic studies, but its purpose is consistent: to provide objective analysis that improves the quality and durability of policies. Scholarship on public administration stresses that independent scrutiny improves performance by providing checks on self-assessment and by linking long-term goals to short-term administrative actions.⁴⁷ Comparative climate governance research similarly finds that jurisdictions with

structured independent review, formal or informal, tend to maintain more consistent progress across political cycles.

- **Link transparency and review to adaptive policymaking:** TMR and IR are not ends in themselves; their value lies in shaping more adaptive and responsive policy processes. The IPCC emphasises that climate governance must be iterative, with periodic assessments informing policy redesign as conditions evolve. Adaptive governance requires feedback loops between data, analysis, decision-making, and implementation. When review systems identify emerging gaps, such as slower-than-expected sectoral emissions reductions or new climate risks, governments should be able to adjust policies, reallocate resources, or strengthen institutional arrangements. This continuous learning function is essential for managing long-term transitions, which are, by definition, characterised by significant uncertainty.

Taken together, these operational requirements illustrate that TMR and IR systems form a dynamic governance architecture. They illuminate progress, expose gaps, structure decision-making, and reinforce accountability. In the climate domain, these functions are indispensable for ensuring that long-term targets are not aspirational signals, but actionable commitments embedded within government routines.

III. INTERNATIONAL EXPERIENCE: COMMON PATTERNS AND LESSONS

International practice demonstrates that TMR and IR are indispensable components of effective climate governance, regardless of political system, administrative tradition, or legal framework. While jurisdictions differ in how they structure their institutions, several common patterns emerge across those that have built durable, credible climate governance systems. As outlined in Chapter 2, these approaches reflect broader governance choices, from statutory obligations in the United Kingdom

to administrative coordination in Mainland China and integrated reporting in Singapore. Despite their differences, these jurisdictions share underlying principles that illuminate why TMR+IR systems are essential for long-term climate action.

- **Transparent information flows are foundational to accountability:** Across leading systems, transparency is treated not merely as a compliance obligation but as a governance tool that shapes behaviour. Public access to emissions data, sectoral policies, and progress indicators allows assessment of whether governments are on track and whether stated ambitions are matched by delivery. The United Kingdom does this through legally mandated publications of carbon budgets, annual progress assessments, and government responses. Singapore, although non-statutory, institutionalises regular climate and sustainability reporting through its Green Plan updates. These systems illustrate a central lesson: transparency must be structured, regular, and linked to decision-making processes to exert meaningful influence on policy and public expectations.
- **Monitoring systems must support comparability, consistency, and course correction:** Effective monitoring frameworks in the United Kingdom, the Chinese Mainland, and Singapore rely on standardised indicators and methodologies that allow emissions trends and policy performance to be assessed over time. The United Kingdom's carbon accounting framework provides consistent baselines for evaluating mitigation pathways. China's 1+N system places strong emphasis on statistical standards and administrative monitoring, integrating climate metrics into national and sectoral plans. Singapore's integration of climate metrics into its budgeting and planning processes ensures monitoring is embedded in routine administrative practice. The European Union provides another useful example, with its legally mandated Monitoring-Reporting-Verification system underpinning the EU Emissions Trading System, National Energy and Climate Plans, and

compliance procedures. This framework ensures cross-country comparability and reinforces policy consistency.⁴⁸ All these examples demonstrate that monitoring is most effective when embedded into existing government systems rather than treated as an external or technical add-on.

- **Regular reporting creates predictable policy cycles and reinforces credibility:** Jurisdictions with strong reporting systems publish climate information on predictable schedules tied to institutional cycles with annual reports, budget seasons, or strategic reviews. This regularity helps governments maintain momentum, provides clear signals to all stakeholders and the public, and improves policy coherence. The most effective systems require reporting to be forward-looking, linking past performance with future planning. This ensures that reporting is not merely retrospective but supports iterative policy development. Predictable reporting cycles create a rhythm of assessment and adjustment that strengthens long-term policy credibility.
- **Independent review strengthens trust and improves performance:** Independent scrutiny, whether formal, semi-formal, or advisory, varies across jurisdictions but plays a vital role everywhere. The United Kingdom's statutory Climate Change Committee (CCC) provides authoritative assessments of government performance, identifies delivery gaps and risks, and issues recommendations that shape national debate and policymaking. New Zealand similarly combines the statutory independent expertise of its Climate Change Commission with mandatory climate-related disclosures for major financial institutions, strengthening both policy oversight and market transparency.⁴⁹ The Chinese Mainland employs expert panels, research institutes, academies, and technical review mechanisms to inform decision-making. While these arrangements may not fit Western notions of institutional "independence," they are in practice highly professional, evidence-based, and designed to generate real information that supports policy implementation. Singapore commissions studies and draws on advisory committees to introduce external perspectives that strengthen cross-government coordination. South Korea's Presidential Committee on Carbon Neutrality and Green Growth illustrates another model, combining high-level political coordination with structured expert review to guide implementation of national climate plans.⁵⁰ Across these diverse systems, the shared lesson is clear: review mechanisms, regardless of their institutional form, enhance credibility, improve policy quality, and mitigate the inherent biases of self-assessment. What ultimately matters is not the legal status of the reviewer but the function of providing analytically grounded, quality input that informs government decisions.
- **Transparency and review systems support adaptive, long-term governance:** Leading jurisdictions treat TMR and IR as tools for adaptive governance rather than as bureaucratic exercises. Their systems are designed to identify emerging risks, highlight underperformance, and adjust expectations over time. This is especially important for climate policy, where scientific knowledge evolves and socio-economic conditions shift. The most effective systems institutionalise feedback loops between data, analysis, and policy revision, ensuring that climate plans remain aligned with changing realities.

Taken together, these international experiences show that TMR and IR are not optional enhancements but structural features of robust climate governance. Although jurisdictions differ in institutional design, the most successful systems share an underlying logic: information must be visible, performance must be measurable, and expert scrutiny must inform decision-making. These international lessons do not imply that Hong Kong should replicate some other model, but they highlight governance principles that can be adapted to Hong Kong's executive-led system.

IV. HONG KONG'S EXPERIENCE WITH TRANSPARENCY, MONITORING, REPORTING, AND INDEPENDENT REVIEW

While the HKSAR Government publishes greenhouse gas inventories, climate plans, and periodic updates, the overall system could improve on the timeliness, clarity, accountability, and evaluative rigor that characterise strong climate governance regimes. Several longstanding issues – such as slow publication of emissions data, inconsistent timetable and disclosure of committee deliberations, and the absence of independent review – could be corrected in the coming term of government (2027-2031) to strengthen credibility and the effectiveness of policy implementation.

- **Timeliness and accessibility of emissions data:** Hong Kong publishes an annual greenhouse gases inventory following IPCC guidelines. However, the release of emissions data consistently lags by

nearly two years, making it difficult for stakeholders to track progress in real time or to assess the effectiveness of ongoing policy measures. This delay contrasts with other jurisdictions, such as the United Kingdom, European Union, and New Zealand, that typically release provisional emissions data within months to support responsive policymaking.

This lag in reporting cycle has been noted by local academics and think tanks – they see Hong Kong's data lag as undermining transparency and reducing the usefulness of emissions information in public deliberation and policy planning.⁵¹ Faster reporting should be possible and would allow policymakers and the public to identify trends, evaluate sectoral performance, and adjust measures earlier, especially in fast-moving sectors such as transport and electricity generation.

BOX 7A

Beyond Compliance: Building a Timely and Strategic Emissions Data System

Civic Exchange's 2026 report, *Beyond Compliance: Building a Timely and Strategic Emissions Data System for Hong Kong SAR*, examined how delays in GHG emissions reporting weaken climate governance and policy effectiveness. The report highlights that Hong Kong's emissions data are typically released almost two years after the reporting year, reducing their usefulness for policy adjustment, investment decision-making, and public accountability.

Drawing on international experience from the United Kingdom, Singapore and the European Union, the report argues that emissions data should be treated not merely as a compliance output but as a strategic governance tool. Jurisdictions that publish provisional or early emissions estimates within

months are better able to identify underperforming sectors, align climate policy with fiscal and infrastructure planning, and provide credible signals to markets and the public.

The report emphasises that the data lag is not driven by technical constraints but by institutional practices and reporting conventions. Many of the necessary datasets already exist across government departments, including energy, transport and electricity system data. The challenge lies in coordination, ownership and the absence of a structured reporting cycle.

Civic Exchange recommends introducing a phased, dual-cycle reporting approach, beginning with provisional emissions estimates for sectors with high-frequency data, such

as electricity generation. It also proposes clearer institutional leadership, stronger cross-departmental coordination, transparent methodologies, and consistent communication about the provisional nature of early data. These measures would improve timeliness while maintaining scientific credibility.

The report reinforces a central theme of this chapter: transparency and monitoring systems are most effective when they are embedded into routine governance processes and linked to decision-making cycles. By shortening reporting lags and improving the strategic use of emissions data, Hong Kong could strengthen accountability, enhance policy responsiveness, and build greater confidence among stakeholders without requiring statutory reform or new regulatory bodies.⁵³

- **Reporting by the SCCCN:** When the SCCCN was first established in 2016 (then known as the Climate Change Steering Committee), the government released short summaries of its initial meetings, including broad descriptions of priorities, follow-up actions, and bureau responsibilities.⁵⁴ However, over time, public disclosure declined. Since 2018, no systematic information has been provided on meeting frequency, attendance, decisions taken, or progress reviews, and in some years it was unclear whether the SCCCN had met at all.⁵⁵ The absence of regular reporting contrasts with international practices, where cross-government climate committees typically publish agendas, minutes, or at least annual summaries to signal coordinated action and enable public oversight. The lack of transparency weakens accountability and makes it difficult to assess whether high-level coordination functions effectively in practice.⁵⁶
- **Absence of an independent review mechanism:** Hong Kong does not have an independent body tasked with evaluating government performance on climate mitigation or adaptation. The SCCCN is formally responsible for steering implementation, but it remains an internal executive committee without external membership, evaluative authority, or public-facing review functions. It may be argued that the government reports periodically to the Legislative Council and provides updates to certain advisory bodies, such as the Council for Sustainable Development, but these processes do not constitute systematic, expert-led performance evaluation. Hong Kong could benefit from a credible and institutionalised external review mechanism, even if modest in design, such as periodic evaluations commissioned from universities, domain experts, professional institutes, or multi-stakeholder panels.
- **Monitoring and reporting mechanisms within CAP2050:** Hong Kong's CAP2050 introduced new commitments to strengthen monitoring and reporting, including periodic reviews of decarbonisation measures, enhanced sectoral data collection, and strengthened climate-related financial disclosures. However, it does not define a structured reporting cycle, nor does it require annual public progress updates in a standardised format. As a result, reporting remains ad hoc, making it difficult to track whether the administration is on schedule to meet 2035 and 2050 targets.
- **Fragmented disclosure across bureaux and departments:** The HKSAR Government does make a substantial amount of climate-related information publicly available. Different bureaux and departments publish a wide range of data and information, such as climate science reports from the Hong Kong Observatory, energy end-use statistics from EMSD, and emissions and waste data from EPD. The Environment and Ecology Bureau's *Climate Ready* website also consolidates general information on climate initiatives.⁵⁹ However, despite the breadth of information, the overall disclosure system remains fragmented. The data are dispersed across multiple government portals, provided in varying formats, and not linked to a unified set of climate indicators or progress metrics. International experience shows that jurisdictions with strong transparency frameworks typically provide a centralised platform that consolidates emissions data, policy implementation updates, and progress against targets in a consistent and easily interpretable format. Overall, the information disclosed across government websites in Hong Kong is broad but
- **Faster moving by financial regulators:** The Cross-Agency Steering Committee is aligning disclosure requirements with TCFD and ISSB standards and beginning to incorporate TNFD principles for nature-related risk.⁵⁷ While this has created a strong financial sector transparency framework, there is currently no equivalent systematic reporting for the public sector, despite repeated calls from academics, think tanks, and WWF-Hong Kong.⁵⁸

dispersed and not presented in a consolidated or standardised format, making it of limited use.

V. EVALUATION: HOW HONG KONG PERFORMS UNDER PILLAR 4

While substantial climate-related information is publicly available in Hong Kong, the city lacks the institutional structures that would translate this information into a coherent, credible, and easily understood transparency system. The government's technical departments provide reliable datasets on emissions, energy, weather, and sectoral performance, and these form an important foundation. However, the absence of an integrated reporting framework limits the ability of stakeholders to see how these pieces fit together or to evaluate overall progress toward the city's climate targets.

The most significant shortcomings concern timeliness, coordination, and scrutiny. Emissions inventories are released with long time lags, reporting under CAP2050 is ad hoc rather than embedded in regular policy cycles, and cross-bureau coordination remains largely invisible to the public. These weaknesses reduce the usefulness of data for policy learning and make it harder to assess whether Hong Kong is closing the gap between ambition and implementation.

A further structural gap is the absence of independent review. Without external, expert scrutiny of progress and delivery challenges, climate governance relies almost entirely on internal assessments. Such systems are more vulnerable to optimism bias, selective reporting, and missed opportunities for course correction. While Hong Kong reports to the Legislative Council and engages advisory bodies, these arrangements do not fulfil the evaluative role performed by arms-length bodies or expert review mechanisms in many peer jurisdictions.

Overall, Hong Kong's transparency arrangements can be described as informational rather than institutional. A great deal of information is available, but it is not

organised, reported, or reviewed in ways that support accountability or sustained policy momentum. Strengthening Pillar 4 will therefore require steps that improve integration, predictability, and independent scrutiny within the existing executive-led system. These opportunities are outlined in the next section.

VI. OPPORTUNITIES FOR STRENGTHENING TRANSPARENCY, MONITORING, REPORTING, AND INDEPENDENT REVIEW

Improving Hong Kong's performance under Pillar 4 does not require major institutional overhauls. Many enhancements can be achieved within existing structures by strengthening coordination, clarifying reporting expectations, and embedding regular review practices. The goal is to create a more coherent and predictable transparency system that supports climate delivery across administrations while remaining consistent with Hong Kong's executive-led governance model.

1. Establish a structured, annual climate reporting cycle

A predictable reporting cycle, such as the annual or biennial progress updates adopted in many jurisdictions, would significantly enhance policy clarity. A "Hong Kong Climate Progress Report," coordinated by the SCCCN and EEB, could consolidate key information from bureaux and departments, including emissions trends, policy implementation updates, and forward planning. This need not be statutory; it can be implemented as an administrative practice. A predictable reporting rhythm would strengthen accountability, support policy learning, and allow stakeholders to track progress against the 2035 and 2050 targets.

2. Consolidate data into an integrated climate information platform

Bureaux and departments will rightly continue to publish climate-related information specific to their mandates, such as HKO climate reports, EMSD energy statistics, EPD waste and emissions data,

and sector-specific strategy updates. However, these materials are currently dispersed and vary in format. Strengthening the *Climate Ready* portal into a centralised, user-friendly platform would allow the public to access a consolidated view of Hong Kong's climate metrics, sectoral indicators, adaptation measures, and implementation timelines. The portal should not replace bureau or department level publications, but rather act as an integrative layer that consolidates key indicators and links seamlessly to bureau and departmental sources, referencing their sources while providing consistent indicators and summary dashboards. Effective implementation would require dedicated design and a team responsible for regular updates and interface improvements. International experience shows that consolidated portals significantly improve usability, public understanding, and investor confidence in existing data.

3. Improve the timeliness of emissions and performance data

To support policy adjustment and sectoral planning, Hong Kong could publish provisional emissions estimates within 6-12 months of the reporting year, while continuing to release the full IPCC-compliant inventory on a longer timetable. Many jurisdictions use early estimates to guide decision-making. Even coarse provisional data would provide greater visibility of trends and enable earlier course corrections.

4. Enhance transparency around the SCCCN's coordination role

Without altering its structure, the SCCCN could meet at least twice a year and adopt simple disclosure practices that improve public understanding of cross-bureau coordination. These could include publishing short summaries of meeting agendas, key discussions, decisions taken, and planned follow-up actions. Even high-level updates would strengthen confidence that climate governance is functioning as intended and demonstrate administrative commitment to transparency.

5. Commission periodic external reviews to strengthen credibility

Although Hong Kong may not establish a statutory independent body, it can commission periodic external evaluations, such as every five years, aligned with the Paris Agreement cycle, to assess progress, identify implementation gaps, and provide expert recommendations. These could be undertaken by universities, research institutes, professional bodies, or multi-stakeholder panels. This approach would provide the benefits of independent scrutiny without requiring institutional redesign.

6. Develop standardised climate indicators across bureaux

Creating a simple set of cross-bureau indicators, such as emissions trends, renewable energy deployment, energy performance of infrastructure and buildings, electrification milestones, adaptation and resilience indicators, and climate risk metrics, would make reporting more coherent and allow progress to be measured consistently. These indicators could form the foundation of future annual reports and the integrated data portal.

7. Clarify public sector reporting expectations to align with financial sector standards

Hong Kong's financial regulators, through the CASG, have advanced significantly in implementing TCFD, ISSB, and emerging TNFD-aligned disclosures for the financial sector. CASG should continue to maintain its own website and specialised disclosure ecosystem for finance. However, the public sector can adopt a parallel disclosure approach, ensuring that bureaux and departments also provide clear narrative reporting on climate-related risks, progress, and plans. The *Climate Ready* portal could link to the CASG website to provide an integrated view of climate-related information across the economy, while keeping the two systems operationally distinct and fit for their respective purposes.

In summary, these improvements require no legislative changes and can be introduced incrementally.

Together, they would transform Hong Kong's transparency arrangements from a broad but fragmented information landscape into a cohesive and credible climate reporting system. By embedding structured reporting, consolidating data, improving

timeliness, and incorporating external insights, Hong Kong would strengthen accountability, support more effective climate solution delivery, and enhance confidence among the public, private sector, and international partners.

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HONG KONG PILLAR 5: STAKEHOLDER AND PUBLIC ENGAGEMENT

I. INTRODUCTION

Importance of engagement

Climate change governance depends on the ability of governments to mobilise the knowledge, capacity, and participation of society. Unlike traditional policy areas, climate action spans every sector of the economy and touches every community. It requires scientific and technical expertise, risk management, financial innovation, social resilience, and behavioural change. No government, regardless of institutional structure, can deliver this transition alone.

Effective engagement fills this gap. It connects government with the scientific community, technical specialists, public bodies, businesses, labour groups, youth networks, financial institutions, civil society organisations, and local communities. These actors hold practical knowledge about how systems operate, where vulnerabilities lie, and what is needed for workable solutions. Their participation improves policy design, increases operational realism, elevates social fairness, and strengthens implementation.

Engagement is also central to policy legitimacy. The IPCC AR6 stresses that inclusive and participatory processes enhance trust, reduce conflict, and improve both mitigation and adaptation outcomes. Article 12 of the Paris Agreement recognises the importance of public participation and access to information,

highlighting that climate action is more effective when people understand risks and see themselves as part of the solution.

Different political systems require different methods of engaging stakeholders. Some rely on formal consultations and advisory committees; others mobilise state agencies, mass organisations, expert networks, and community structures. Despite differences in form, the underlying function is the same: to draw upon the full range of societal expertise and capacity to deliver climate goals.

Finally, modern climate governance depends heavily on financial sector engagement. The transition will require substantial investment, new financial tools, insurance solutions, and market creation. Governments must work with financial institutions, regulators, insurers, and investors to structure risk, mobilise capital, and protect vulnerable communities during the transition. Without sustained engagement with the finance and insurance sectors, climate objectives will remain out of reach.

In short, stakeholder and public engagement is not peripheral to climate governance – it is essential to its success. It helps governments design better policies, mobilise resources, protect vulnerable groups, build public trust, and sustain long-term climate ambition.

II. DEFINING CORE FUNCTIONS OF STAKEHOLDER AND PUBLIC ENGAGEMENT

Defining “engagement”: terminology and scope

In this report, engagement refers to the spectrum of practices through which governments involve societal actors in climate governance. Engagement includes informing stakeholders, consulting them on policy options, collaborating with them on solutions, and mobilising organisations or communities to support implementation.

These modes differ in depth:

- Consultation gathers views.
- Collaboration involves shared problem-solving or co-production.
- Mobilisation activates networks and institutions for coordinated action.

Engagement encompasses, rather than replaces, these modalities. The forms vary across political systems, but the underlying governance function – integrating societal knowledge, capacity, and participation into climate action – is universal.

Hence, stakeholder and public engagement refer to the systems, practices, and channels through which governments engage with societal actors to inform, design, and implement climate policy. It goes beyond consultation or information sharing; it is a continuous governance function that ensures climate action is grounded in evidence, operational realities, and social needs.

The following functions that define this pillar explain why engagement is a core governance capability rather than a supporting activity:

- **Bringing diverse expertise into policy design:** Climate governance requires knowledge from climate science, engineering, land use and transport planning, public health, labour protection, insurance and finance, behavioural science, and community resilience functions. This expertise

is distributed across society, not held within any single domain. Effective engagement provides government access to specialised knowledge, lived experience, and operational insights that would otherwise remain outside formal policymaking processes. This reduces technical blind spots and helps ensure policies are realistic, targeted, and implementable.

- **Ensuring coordinated action across the systems that deliver climate outcomes:** Climate mitigation and adaptation depend on the actions of multiple public bodies and economic actors. Engagement helps align expectations, clarify roles, identify constraints early, and improve the sequencing of policy measures, while fostering a shared sense of ownership and agency among stakeholders. It allows frontline actors to shape how policies are implemented and ensures that measures are feasible within their operational and financial constraints.
- **Mobilising finance and structuring markets for the transition:** The low-carbon and climate-resilient transition requires substantial investment and new forms of financial intermediation. Engagement with financial institutions, insurers, regulators, market associations, and professional bodies enables governments to co-create financing mechanisms, risk-sharing arrangements, and insurance products that support households, firms, and communities. These engagements also help shape market standards and build confidence among investors and insurers, ensuring that climate policy is supported by viable financial pathways.
- **Enhancing social fairness and protecting vulnerable groups:** Climate policies have uneven impacts across society. For example, outdoor workers are more exposed to heat; low-income households have less ability to invest in energy efficiency; small businesses face different risks than large corporations; and elderly or medically vulnerable groups require tailored adaptation

- measures. Engagement with labour groups, welfare NGOs, social workers, youth networks, and district leaders helps governments understand distributional impacts, avoid unintended consequences, and design socially equitable transitions. This strengthens both fairness and political feasibility.
- **Supporting public understanding, behavioural change, and shared responsibility:** Many climate policies depend on individual and organisational behaviour, such as energy use, waste practices, and preparedness for extreme weather. Engagement is therefore essential for public communication, trust-building, and education. Article 12 of the Paris Agreement highlights public awareness and participation as integral to meeting global climate goals, and the IPCC notes that inclusive processes improve societal readiness and reduce friction during implementation.
 - **Strengthening legitimacy and long-term policy endurance:** Climate action must span decades and survive economic, administrative, and political-

electoral cycles. Engagement builds legitimacy by demonstrating that policies reflect societal input and respond to real concerns. When stakeholders see their insights incorporated, they are more likely to support implementation, comply with new rules, and help mobilise resources. This contributes to the stability and durability of climate policies over time.

III. INTERNATIONAL EXPERIENCE:
DIVERSE APPROACHES TO ENGAGING
STAKEHOLDERS

Although political systems vary widely, international experience shows that broad, structured, and regular engagement across society is indispensable for effective climate governance. In all jurisdictions, governments rely on societal actors to provide technical expertise, operational capacity, financial resources, and community-level insights; what differs is the institutional form through which engagement occurs. Several methods of engagement emerge from comparative experience.

1. Formalised consultation and independent advisory expertise	The United Kingdom embeds stakeholder engagement within a highly institutionalised governance framework. Public consultations are routinely conducted for major climate strategies; industry groups, environmental organisations, professional bodies, local authorities, and community groups contribute through structured calls for evidence and expert panels. The Climate Change Committee (CCC) plays a central role in aggregating expert insight, advising Parliament, and providing independent analysis that shapes public debate. Beyond formal processes, the United Kingdom has experimented with participatory innovations, such as the UK Climate Assembly, which brought randomly selected citizens together to deliberate on future climate pathways. ⁶⁰ Although such bodies do not replace conventional policymaking, they broaden public understanding, improve social legitimacy, and inform government decisions.
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2. Mobilisation-based engagement through state, expert, and social organisational networks	Mainland China engages stakeholders primarily through coordinated mobilisation. Scholarly analyses describe China's engagement practices as shaped by expert consultation, administrative mobilisation, and extensive use of policy pilot programmes. Engagement is channelled through expert committees, state-owned enterprises, mass organisations, and local governments, rather than through the deliberative mechanisms common in liberal democracies. These features reflect China's administrative traditions and have proved effective in coordinating policy implementation at scale.⁶¹
3. Tripartite model blending government leadership, industry partnership, and labour participation	Singapore's approach reflects its governance culture: engagement is systematic, pragmatic, and oriented toward implementation. Government works closely with industry associations, technical experts, and labour unions through tripartite committees and thematic working groups. These mechanisms ensure that policy proposals are tested for feasibility, workforce impacts, and market implications before implementation. Engagement also extends to financial institutions, which are integrated into Singapore's green finance and climate-risk initiatives. Public consultation processes tend to be targeted and pragmatic, aimed at helping the government test feasibility and implementation pathways. This model demonstrates how engagement can be tightly coupled with administrative coordination to support rapid rollout of policies.⁶²
4. Community-based engagement and partnership with indigenous governance structures	New Zealand provides an important contrast through its emphasis on community participation, localised adaptation planning, and partnership with indigenous people. Engagement is characterised by deliberation, co-governance, and respect for local knowledge, particularly in areas such as land management, biodiversity, and climate adaptation. Local authorities routinely engage communities in developing climate resilience plans, while financial regulators and local governments work closely with insurers and banks to manage climate-related risks such as coastal erosion and flooding. This demonstrates how engagement can incorporate local governance, build social cohesion, and enhance climate resilience.⁶³

In summary, across these diverse models, several common threads emerge. Governments rely on engagement to obtain specialised expertise, stress-test policy proposals, identify social impacts, and secure cooperation from actors responsible for implementation. Engagement also supports public understanding, strengthens legitimacy, and builds support for long-term transitions.

Finally, jurisdictions that integrate engagement into routine policy cycles, rather than treating it as a one-off exercise, tend to demonstrate more robust climate delivery. This reflects a key lesson for Hong Kong: the value of engagement lies not only in who participates, but in how systematically and continuously it is embedded within the climate governance architecture.

IV. HONG KONG'S EXPERIENCE WITH STAKEHOLDER AND PUBLIC ENGAGEMENT

Hong Kong has a long tradition of governing through a dense network of advisory, statutory, and quasi-governmental bodies, complemented by a large non-governmental social welfare sector and an active community of professional and business organisations. This institutional landscape provides multiple channels for stakeholder input, while reflecting the city's particular political economy and the executive-led nature of its system.

1. A dense ecosystem of advisory and statutory bodies

Hong Kong's stakeholder engagement practices are shaped by its long-standing reliance on a dense ecosystem of advisory and statutory bodies (ASBs), which is distinctive among advanced city jurisdictions. The Home and Youth Affairs Bureau reports that Hong Kong currently has more than 500 ASBs, with several thousand appointed members serving across a wide portfolio of committees and public bodies tasked with advising government or performing regulatory and quasi-public functions.⁶⁴ Over several decades, scholars have observed that this expansive network of committees has become a defining characteristic of Hong Kong's executive-led system.⁶⁵ ASBs serve as a principal mechanism through which the government gathers policy feedback, accesses technical expertise, and maintains regular contact with sectoral interests.

Historically, the number of such bodies has grown steadily, especially from the 1970s onward, when the administration sought to broaden its consultation channels and secure support from business, professional, and quasi-public organisations. ASBs perform an important administrative bridging function: they help the government be responsive to organised interests, secure technical advice, and ensure smoother implementation across sectors that are critical to economic and social stability.⁶⁶ At the same time, many of these bodies are primarily appointed, with membership drawn heavily from

professionals, business leaders, and public figures. As a result, engagement tends to reflect a form of structured, elite-mediated responsiveness.

In the context of climate governance, this institutional architecture means that government has numerous channels for engaging sectoral stakeholders, with committees covering energy, infrastructure development and built environment, transport, and related fields. The ASB system provides substantial technical and sectoral input, but it may not fully capture the breadth of societal perspectives needed for a whole-of-society climate transition.

2. Public bodies, business, schools and social organisations as climate actors

Hong Kong also relies heavily on public bodies, utilities, franchised operators, and welfare and district-based organisations to deliver services that are directly relevant to climate mitigation and/or adaptation.

Key examples include:

- Two power utilities, which operate under longstanding Schemes of Control Agreements with the government, are central to the decarbonisation of electricity supply.
- Franchised transport operators, such as bus and mini-bus companies operating under government franchises, play a critical role in decarbonising road transport with cleaner fuels and/or electrification, which contributes to climate and air quality goals.
- The MTR Corporation is a publicly listed company whose majority shareholder is the HKSAR Government. As the operator of Hong Kong's heavy rail, light rail, and mass transit network, it plays a central role in supporting low carbon mobility. Its longstanding "rail-plus-property" development model, which integrates railway construction with commercial and residential development around stations, has also shaped urban form and land-use

patterns. Together, these functions give the MTR Corporation significant influence over Hong Kong's decarbonisation pathway.⁶⁷

- Hong Kong's ferry operators, which provide services under franchises or licences issued under the Ferry Services Ordinance (Cap. 104),⁶⁸ are important actors in the climate transition. In addition to local routes, cross-boundary services to Macau and GBA cities are operated by Hong Kong-Mainland joint ventures and Mainland Chinese companies under Hong Kong licensing arrangements. As providers of essential marine transport, these operators could shift towards cleaner fuels and/or vessel electrification where feasible, and stronger resilience to extreme weather, and therefore form a key part of the stakeholder landscape in maritime decarbonisation.
- Hong Kong's education sector is also an important part of the stakeholder landscape. Most of Hong Kong's primary and secondary schools are government, aided, or subsidised institutions, and all publicly funded tertiary institutions receive recurrent grants from the University Grants Committee. As large campus operators, schools and universities manage significant building portfolios and energy use and are therefore relevant to mitigation efforts in the built environment. They also educate a large cross-section of Hong Kong's population, from young children to university and post-graduate students, giving them substantial influence in shaping climate awareness, knowledge, and social norms. Engagement with the education sector is thus important both for embedding climate considerations into campus operations and for fostering a climate-literate society capable of supporting long-term transition goals.⁶⁹
- Hong Kong's social welfare organisations also form a major part of the stakeholder landscape. Most established welfare NGOs operate under

the government's subvention system, receiving recurrent funding from the Social Welfare Department (SWD) and following government-issued guidelines on service standards, reporting, and operational procedures. As operators of community centres, residential care homes, family service units, youth centres, and other frontline facilities, these organisations manage significant building portfolios and provide essential services to groups that are particularly vulnerable to climate risks, such as the elderly, low-income households, persons with chronic illnesses, and people living in substandard housing. Their role in climate governance is therefore twofold: they must strengthen the resilience and energy performance of their own facilities, and they play a critical community-facing role in raising awareness, disseminating climate-risk information, and supporting vulnerable populations during extreme heat, typhoons, and other weather-related emergencies.

Taken together, these features show that stakeholder engagement in Hong Kong is deeply embedded in service delivery, rather than operating primarily through stand-alone consultation processes. Many of the organisations most relevant to climate mitigation and adaptation are neither traditional government departments nor purely private actors, but public bodies, utilities, franchised operators, educational institutions, and government-funded social organisations whose mandates, funding arrangements, and performance are closely aligned with government priorities.

From a climate governance perspective, these entities are therefore essential partners in delivery. They play a central role in implementing mitigation and adaptation measures, protecting vulnerable populations, and supporting behavioural change, particularly during periods of heightened climate risk such as heatwaves, typhoons, and other extreme weather events.

3. Professional, industry, and semi-public bodies

Hong Kong also possesses a rich ecosystem of professional bodies and semi-public intermediaries that are highly relevant to climate policy in the built environment and finance. These include institutes of engineers, architects, surveyors, planners and other construction-and-property related professions, as well as chambers of commerce, industry associations, trade federations, and sectoral organisations in financial services including banking and insurance. These bodies and their individual and corporate members are frequent targets for engagement by government.

4. Consultation practices and climate-related policy processes

Hong Kong has used public consultation and engagement exercises to inform its climate strategies. *Climate Action Plan 2030+* drew on the 2015 public consultation on the *Energy Saving Plan for the Built Environment*, while *CAP2050* was shaped by the Council for Sustainable Development's citywide public engagement on Hong Kong's Long-term Decarbonisation Strategy in 2019-2020. These processes generated input from a range of stakeholders and members of the public, although they were not framed as consultations on the Climate Action Plans themselves.⁷⁰ In forming the first BSAP in 2016 and second one in 2025, formal public consultations were held.⁷¹ These exercises generated submissions from a wide range of actors: professional institutes, chambers of commerce, environmental NGOs, social welfare organisations, academics, district councils, community groups, and individual citizens.

In addition, many of the advisory and statutory bodies described above serve as default venues for routine engagement. Sectoral committees meet periodically to review proposed measures, offer feedback, and sometimes broker compromises between government and affected interests. From a climate governance perspective, this means that engagement is often channelled through established, organised groups

rather than through open-ended participatory processes. This reflects the broader political economy of Hong Kong, where business and professional elites, quasi-public bodies, and community groups have long played prominent roles in policy deliberation and implementation.

In summary, Hong Kong's experience shows that it possesses substantial institutional capacity for engagement. The structures for this engagement provide multiple points of contact between government and stakeholders on climate-related issues. At the same time, the system is highly structured and mediated, with engagement often occurring through appointed bodies and organised intermediaries.

V. EVALUATION: HOW HONG KONG PERFORMS UNDER PILLAR 5

Hong Kong's performance under Pillar 5 reflects the strengths and limitations of its broader governance model. The city possesses a large, structured, and institutionalised ecosystem for stakeholder engagement, anchored in its extensive network of organisations. These channels provide government with regular access to sectoral expertise, operational experience, and professional knowledge, and they support the implementation of public policies, including climate-related. Public consultations on major policies have also generated structured input from organised groups and interested members of the public.

Hong Kong's consultation and advisory system is primarily oriented toward organised intermediaries – important businesses and professional bodies, quasi-public agencies, and established NGOs. This provides strong technical and sectoral representation but leaves fewer opportunities for broader community voices, including youth groups, neighbourhood organisations, or residents facing disproportionate vulnerability to climate risks. Engagement on climate issues is often conducted on an issue-by-issue basis,

without a stable, cross-sector mechanism dedicated to continuous dialogue on mitigation, adaptation, or resilience.

Moreover, while many social organisations are deeply involved in service delivery during extreme weather, their engagement in upstream climate policy design is less systematic. Channels for integrating local knowledge, such as insights from welfare organisations serving heat-stressed elderly people or teachers working on climate education, remain fragmented. Engagement with the financial sector has progressed significantly through the CASG, but similar structured engagement for the wider public sector and social institutions is still emerging.

Finally, Hong Kong's consultative tradition supports policy feedback, but less often co-creation or joint problem solving. Compared with jurisdictions that use deliberative processes or statutory community partnership structures, Hong Kong's model relies on government-led processes that gather stakeholder views rather than share decision-making authority. This does not diminish the value of engagement within Hong Kong's executive-led system, but it highlights an opportunity to develop more systematic, inclusive, and future-oriented modes of dialogue as climate impacts intensify.

Overall, Hong Kong performs moderately well under Pillar 5 in terms of structured engagement with organised stakeholders and service providers. Its infrastructure for consultation is extensive, and many institutions have long-standing working relationships with the government. However, the system could be strengthened by broadening participation, deepening cross-sector dialogue, and creating more continuous engagement mechanisms to support the long-term climate transition.

VI. OPPORTUNITIES FOR STRENGTHENING STAKEHOLDER AND PUBLIC ENGAGEMENT

Effective engagement in climate governance is not a one-off consultation exercise but a continuous, structured process that supports coordination, learning, and delivery over time. Given the long-term nature of climate change and the cross-sectoral character of climate policy, engagement is most effective when it is organised around a predictable governance cycle rather than conducted on an ad hoc basis. A key opportunity for strengthening Hong Kong's engagement practices is as follows:

1. Use a unified 5-year cycle to structure review, coordination and engagement

A 5-year climate cycle provides a practical way to organise engagement in Hong Kong. It aligns naturally with the Paris Agreement's 5-year ambition and review rhythm and with the Chief Executive's term of office, offering a coherent temporal framework through which priorities can be set, progress assessed, and adjustments made within each administration.

Such a cycle serves several governance functions:

- It creates predictability, enabling stakeholders and the public to understand when strategies will be reviewed and when input is most relevant. This reduces uncertainty for businesses, investors, civil society organisations, and the public.
- It helps link long-term climate objectives to near-term decision-making, ensuring that engagement informs responses to implementation challenges, sequencing, and trade-offs, rather than remaining confined to high-level vision-setting.
- It supports institutional learning, by embedding feedback loops between stakeholder experience, policy design, and observed outcomes.

In practical terms, a 5-year engagement cycle could operate as a once-per-administration process led through existing governance arrangements. For instance, the Climate Commissioner could prepare a “Climate Progress and Engagement Report”, consolidating sectoral assessments, stakeholder input, and policy priorities. The commissioner’s report would provide a transparent reference point for government, stakeholders, and the public, and

would inform subsequent updates to climate action plans and sectoral strategies, followed by structured engagement with key sectors. This approach would allow engagement to evolve from episodic consultation toward a more cumulative and strategic process. Existing bodies such as the SCCCN and OCCN, advisory committees, and sector-specific platforms could serve as anchoring mechanisms, avoiding the need to create entirely new institutions.

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