



Roadmap for ESG Development for Logistics Industry



Transport and Logistics Bureau

The Government of the Hong Kong Special Administrative Region
of the People's Republic of China

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Foreword

Sustainability is a growing international trend for all industries. At the heart of it is Environmental, Social and Governance (ESG), which is a fast-evolving framework that informs corporate performance in environmental protection, social responsibility and corporate governance resilience. Various countries and regions, notably the European Union (EU), have started to embrace ESG, with disclosure requirements originally confined to their respective domestic operations but increasingly extended to the whole supply chain. In fact, the EU has become the first jurisdiction to require such ESG disclosure along the whole supply chain from this year onwards, thereby making ESG a global issue. In the meantime, the Mainland is also moving fast and formulating its own ESG disclosure standards that are planned to be applicable to all companies, including small and medium enterprises (SMEs), by 2030. With such developments, international ESG adoption will likely be irreversible.

The impact of ESG is especially relevant to the trading and logistics sector due to its intrinsically international nature of business. With logistics being one of the pillar industries, Hong Kong in particular should ride the global ESG trend, lest we will lose out to our competitors in the global supply chain.

Against this backdrop, the Government committed in the Action Plan on Modern Logistics Development promulgated in October 2023 to promoting green and sustainability in the logistics sector. Specifically, a roadmap will be formulated to outline a framework for our logistics industry's reference, so as to raise the industry's awareness of ESG and assist the industry in following and consequently meeting international ESG requirements, thereby consolidating and enhancing Hong Kong's position as an international logistics hub.



Chapter 1

What is ESG?

What is ESG?

ESG is a guiding framework for sustainable development across various industries. ESG principles provide companies with a structured approach to managing and measuring their operation impact in areas that go beyond financial performance, reflecting a commitment to responsible and sustainable practices.

	E - Environmental	S - Social	G - Governance
Pillar focus	Minimising negative environmental impacts, primarily encompassing emission reduction, resource conservation, waste management and energy efficiency	Ethical practices, labour rights and community engagement	Transparent, ethical business practices and sound decision-making structures
Relevance to logistics industry	May involve minimising packaging waste, implementing resource-efficient measures, adopting cleaner fuels, optimising routes to reduce fuel consumption, or transitioning to electric vehicles	May involve ensuring fair labour practices in compliance with local and international labour standards, providing a safe working environment and engaging in responsible community interactions	May involve transparent reporting, adherence to relevant standards such as Corporate Governance Code and anti-corruption policies, as well as the establishment of compliance mechanisms to ensure regulatory alignment
Relevant performance indicators	<ol style="list-style-type: none"> 1. Greenhouse gas emissions 2. Energy consumption 3. Water usage 4. Waste generation and recycling rates 5. Packaging materials used 6. Fleet efficiency 7. Route optimisation 8. Compliance with environmental regulations 	<ol style="list-style-type: none"> 1. Employees' health and safety 2. Employees' training and development 3. Employee engagement and satisfaction 4. Labour practices 5. Diversity and inclusion 6. Community engagement 7. Customer satisfaction 	<ol style="list-style-type: none"> 1. Data security and privacy protection 2. Avoiding corruption and bribery 3. Management diversity 4. Assurance and certification 5. Ethical corporate culture

Table 1: Focus of different pillars of ESG and relevance to the logistics industry

Environmental Pillar – Different Scopes of Emissions

Greenhouse gas emissions of an organisation are classified into three scopes, commonly referred to as Scope 1, Scope 2, and Scope 3 emissions (refer to Figure 1), to facilitate a comprehensive assessment of emissions within the organisation's operations and broader value chain. Scope 1 emissions pertain to direct emissions controlled or owned by the organisation; Scope 2 includes indirect emissions from purchased and utilised electricity; while Scope 3 encompasses all other indirect emissions resulting from the organisation's value chain activities, both upstream and downstream.

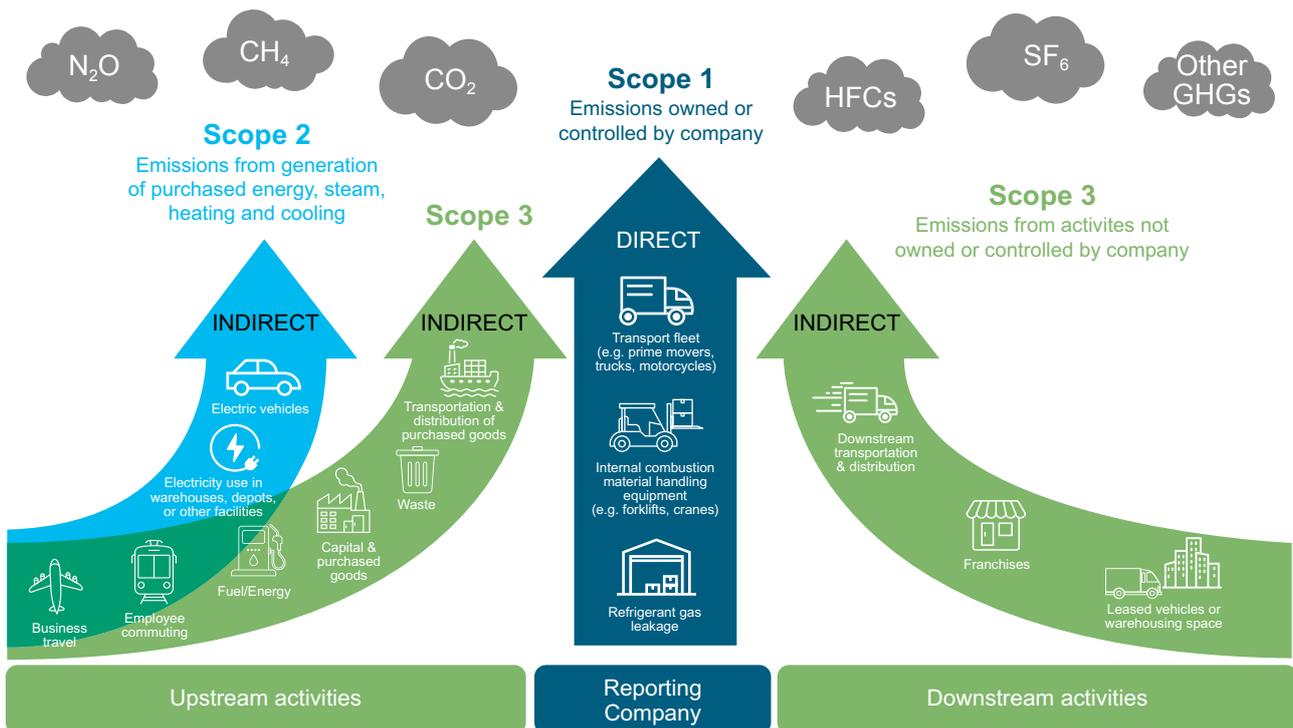


Figure 1. Sources of scope 1, 2 and 3 emissions



Chapter 2

ESG as a Global Trend

ESG as a Global Trend

International trend

Since its birth as a concept in the early 2000s to guide socially responsible investing behaviours, ESG has gradually evolved into a comprehensive approach that shapes corporate strategy and public policy. Various countries are increasingly recognising the urgent need to align their policies and practices with these evolving frameworks, reflecting a collective determination to foster corporate responsibility and sustainable growth.

Different countries and regions have adopted different approaches to ESG. The EU has gone the furthest by far by making ESG disclosure mandatory. Under the Corporate Sustainability Reporting Directive (CSRD), all large companies and all listed companies are required to disclose information on what they see as the risks and opportunities arising from social and environmental issues, and on the impact of their activities on people and the environment. These disclosures must follow the European Sustainability Reporting Standards (ESRS), which provide the detailed reporting requirements. CSRD also mandates that such disclosure should be subject to third-party assurance. The implementation of CSRD is accompanied by other regulatory tools adopted by the EU to promote sustainability, such as the Cross-Border Adjustment Mechanism (CBAM), which by imposing a fee on imports of certain goods based on their carbon content, thereby ensuring that foreign producers comply with the same environmental standards as EU producers, could have wide-ranging implications on ESG adoption worldwide.

Elsewhere, mandatory ESG disclosure is more limited in scope, such as through stock exchange listing rules, and in many cases, ESG adoption is voluntary. Yet, ESG reporting standards are gradually converging, with the frameworks put forward by Global Reporting Initiative (GRI), Sustainability Accounting Standards Board (SASB) and International Sustainability Standard Board (ISSB) leading the way, alongside ESRS framework. In particular, the ISSB framework is emerging as the most influential standard for sustainability reporting. National ESG strategies are also being drawn up. Most significantly, the Mainland plans to finalise by 2030 the Corporate Sustainability Disclosure Standards, which are mandatory sustainability reporting standards for all companies, including SMEs.

On another front, major multinational companies are beginning to impose ESG requirements as a qualifier for tender acceptance. Some, mainly from the EU and the United States (US), are even demanding that service vendors demonstrate gradual progress in their ESG performance.

Implications on Hong Kong's logistics sectors

Globally, traditional markets like the EU are at the forefront of ESG development. The Mainland is also aggressively pursuing ESG reporting, with a plan to mandate it for all companies, including SMEs. Together with the US, where many companies are making ESG compliance a requirement in their procurement contracts, these markets collectively accounted for 60% of Hong Kong's merchandise volume in 2023.

Meanwhile, in the EU, listed companies must disclose Scope 3 emissions data from upstream partners by 2025, followed by large non-listed firms in 2026. This creates a ripple effect, compelling SMEs worldwide to improve their sustainability practices to maintain supply chain relationships and meet the demands of larger business partners. Therefore, it is expected that there will be a global shift toward greater accountability in ESG practices, and Hong Kong as a small and open economy with scores of SMEs well-plugged into the global supply chain will have no choice but to follow the global trends of ESG adoption. Otherwise, Hong Kong companies will risk losing out business to their competitors. Indeed, other regional economies such as Singapore are actively promoting ESG. Adopting ESG practices is no longer simply a choice for Hong Kong logistics companies.





Chapter 3

Hong Kong's current situation in ESG development

Hong Kong's current situation in ESG development

Like most other countries and regions in the world, Hong Kong has no mandatory ESG disclosure requirements except for listed companies. However, the HKSAR Government, as with other jurisdictions such as the Mainland, Singapore, the EU and Canada, has deployed a range of regulatory and voluntary measures that are conducive to ESG compliance, including promulgation of Hong Kong Stock Exchange's ESG Reporting Guide for listed companies, publication of the Hong Kong Taxonomy for Sustainable Finance, issuance of sustainability-linked loans through the Green and Sustainable Finance Grant Scheme, incorporation of ESG considerations into Government's procurement practices, and introduction of the voluntary Hong Kong Quality Assurance Agency's ESG Connect Programme.

In respect of the logistics sector, the Government has also introduced various funding schemes, such as the Pilot Subsidy Scheme for Third-party Logistics Service Providers and Professional Training on Smart and Green Logistics Scheme, that allow logistics companies to acquire ESG-related solutions and trainings.

In terms of ESG performance, on the Environmental aspect, the more significant resource input that is often required for procuring more environmentally-friendly equipment and services means that companies have a tendency to be less proactive in embracing relevant practices. However, on the Social and Governance sides, with a robust legal and regulatory system, Hong Kong already upholds fundamental legal safeguards for social and governance issues, including stringent regulations against child labour and provisions for statutory holidays. At present, as companies comply with legal mandates, they largely meet international expectations in the "S" and "G" aspects.

ESG performance is not uniform across the board. Large corporates in Hong Kong generally recognise that a strong ESG standing can provide competitive advantages and often voluntarily adopt ESG practices as a branding and marketing tool to differentiate themselves in the market. Listed logistics companies, in particular, believe that integrating ESG practices can, apart from meeting the relevant listing requirements, mitigate potential risks, improve employee retention, enhance operational efficiency and gain market access in regions like the EU and the US where clients prioritise sustainability. In fact, large logistics corporates indicated that around 5-10% of their current clients, primarily from the EU and US, have raised stringent ESG requirements. Therefore, ESG practices are already integrated into their operations. Large non-listed companies are comparatively less proactive, but still implement ESG measures to fulfil the requirements of clients, vendors and partners.

On the contrary, knowledge and hence implementation of ESG among logistics SMEs is significantly lower, despite that there is generally some awareness of the concept, and it is often attributed to a lack of available training in the market and in-house resources for adopting ESG practices. Many SMEs adopt a “wait-and-see” approach to ESG and perceive that ESG would entail higher operational cost with uncertain business returns. Some do not foresee implementing ESG practices within the next three years unless compelled by regulatory requirements. In addition, SMEs generally demonstrate a stronger understanding of the “E” (Environmental) aspect, while knowledge of the “S” (Social) and “G” (Governance) components is notably weaker, which results in them frequently overlooking how some of their existing practices could qualify as ESG credits if properly documented and reported.

In view of the above, large logistics corporates, listed or non-listed, seem to have been driven to adopt ESG practices in line with international expectations and standards, and will likely continue for their reputation as well as meeting the requirements of their clients or the markets they enter. On the contrary, Hong Kong logistics SMEs may need assistance in gaining a better understanding of ESG and implementing ESG practices, especially in light that the effect of the scope 3 emission data disclosure requirement in the EU from this year onwards will start to be felt.





Chapter 4

Roadmap

Roadmap

Guiding principles

With a view to providing a clear path for Hong Kong logistics companies to ride the global ESG trend, we aim to put forward a roadmap for Hong Kong's logistics industry to take steps to become compliant with the prevailing global ESG requirements applicable to them. The adoption of this roadmap is recommended but not mandatory. In fact, imposing mandatory ESG regulations on all companies may not be in the best interest of the industry, particularly for SMEs that face resource constraints. That ESG adoption remains mostly voluntary in other jurisdictions, including competing economies in Asia-Pacific, means that Hong Kong's mode of ESG adoption should align with other places to ensure that Hong Kong companies, including logistics enterprises, will compete with their global counterparts on a level playing field.

Given that large logistics corporates have already started to adopt ESG practices, this roadmap will primarily focus on logistics SMEs to help them grasp the basics and start their ESG journeys. Since international ESG standards and reporting requirements are constantly evolving, with the EU being the dominant force driving such development, the roadmap should have a relatively short horizon of about three years. Otherwise, the roadmap may outlive its usefulness as international standards and requirements rapidly change. The roadmap will be subject to review and update ahead of its expiry, so that an updated version will continue to guide logistics SMEs in the next phase of ESG development. In other words, this roadmap shall cover the period from 2025 to 2027.

The aim of this roadmap is to help Hong Kong logistics SMEs to meet the prevailing international ESG requirements applicable to them within the aforesaid horizon, the most stringent of which are from the EU, namely the scope 3 emission disclosure requirement. As such, the goal of this roadmap is to enable Hong Kong logistics SMEs to fulfil such disclosure requirement. That said, judging from the relatively low level of ESG awareness among logistics SMEs, we must start by raising their level of understanding of ESG and then help them with the collection and recording of relevant ESG data, which serves as the cornerstone for meaningful disclosure and eventually reporting and progress tracking. The roadmap will therefore propose the deployment of various tools to achieve this end.

While disclosure is the extent to which the current international ESG regime requires in respect of scope 3 emissions by 2027, the growing ESG trend suggests that the relevant requirements will tighten, especially when regular disclosure should enable more structured and detailed reporting of companies' ESG performance. In this connection, the roadmap will take initial steps to prepare SMEs for such ESG development beyond 2027. This will also pave way for even further ESG developments, such as third-party assurance of recorded ESG data.

Needless to say, the successful adoption of the ESG roadmap will require the collaborative efforts of various stakeholders. The roadmap will therefore suggest relevant parties to play different parts in the implementation of the roadmap to make ESG adoption a reality for logistics SMEs.

Roadmap

This roadmap prioritises the enhancement of logistics ESG data collection and reporting capabilities of SMEs over the next three years. This roadmap comprises three core implementation stages: **(i) awareness building; (ii) logistics ESG schema formation and capacity building; and (iii) capacity enhancement** (see Figure 2). Concrete goals have been established for each stage for SMEs to assess their achievement. While training and promotion are ongoing efforts throughout the roadmap, the emphasis may vary at different implementation stages.

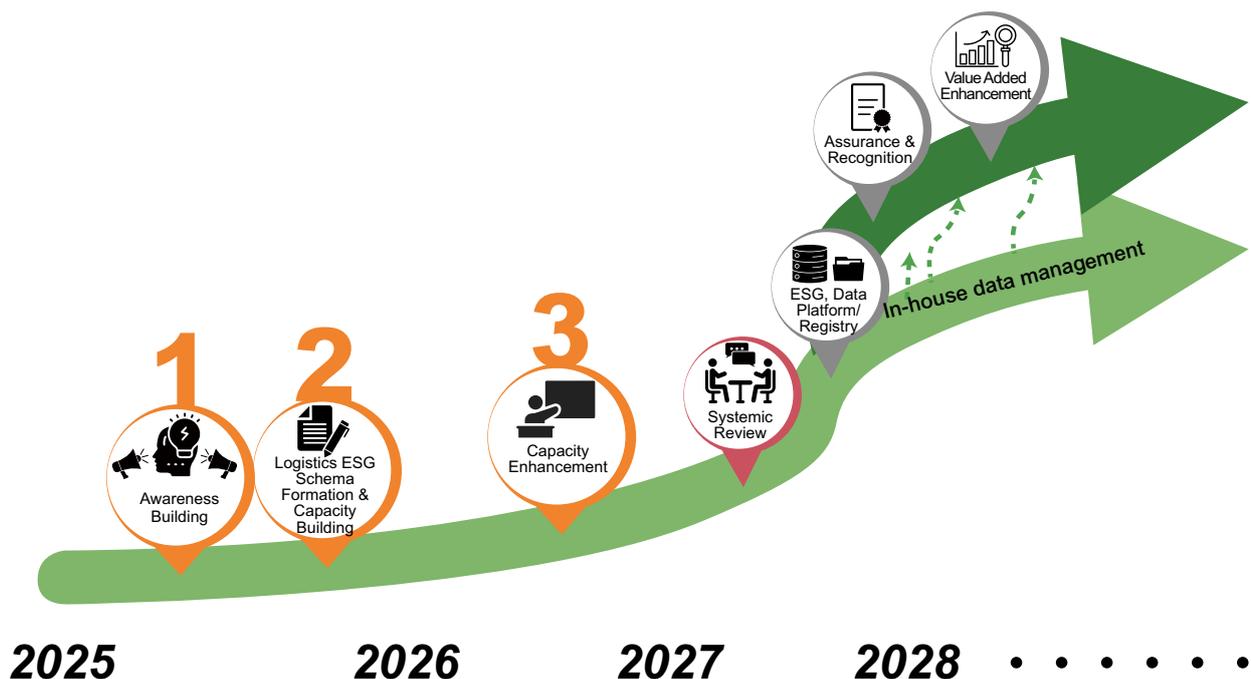


Figure 2 Major stages of the roadmap

Recognising that companies in the logistics industry have varying levels of readiness to embark on their ESG journey, logistics SMEs will have options for managing their data collection at their own pace. The basic option involves in-house management with internal audits, with encouragement for companies to opt for third-party assurance on the recorded data.

Stage (1):

Awareness Building



Goal for SMEs:

To be able to understand major international requirements, general ESG principles and the value of ESG for the logistics sector.

There is a crucial need to enhance awareness of ESG compliance among SMEs in the logistics sector. This awareness is essential for their sustainable growth, competitiveness and positive impact on the overall sustainability of the supply chain ecosystem.

In this connection, the Government will take the lead in providing the industry with valuable resources by launching a dedicated online ESG resource centre to enhance ESG promotion and awareness. The ESG resource centre aims to be a one-stop portal for information related to ESG for logistics companies in Hong Kong, which may include –

- the ESG roadmap and tools for helping logistics companies to follow the steps laid out in the ESG roadmap;
- information on relevant Government subsidy schemes for logistics companies, such as the Pilot Subsidy Scheme for Third-party Logistics Service Providers, the Professional Training on Smart and Green Logistics Scheme and the Logistics Promotion Funding Scheme;
- relevant local legal requirements and administrative measures pertaining to ESG;
- international ESG requirements; and
- news on ESG trends, standards and international best practices;



Funding Scheme	Scheme Coverage
Pilot Subsidy Scheme for Third-party Logistics Service Providers	<ul style="list-style-type: none"> - Provides funding support to eligible third-party logistics service providers for projects related to the adoption of technology on a 2 (Government): 1 (Applicant Enterprise) matching basis, subject to a cumulative subsidy ceiling of HK\$2 million for each applicant enterprise. - In early 2024, enhancement measures were introduced to extend the scope of funding to cover ESG technology solutions and related implementation services, including consultancy services.
Professional Training on Smart and Green Logistics Scheme	<ul style="list-style-type: none"> - Hong Kong registered companies or educational institutions offering or wishing to offer training courses that are non-profit or self-financing, and are directly related to smart and green logistics and related technologies may apply to have their relevant courses registered as pre-approved courses under the Scheme. - Eligible applicants are refunded 80% of the course fees after satisfactory completion of a pre-approved course, subject to a funding cap of HK\$30,000 per applicant.
Logistics Promotion Funding Scheme	<ul style="list-style-type: none"> - Provides sponsorship of up to 100% of the total project costs for local promotional campaigns and activities organised by eligible logistics-related organisations and professional bodies for promoting the smart, innovative, high-end and professional image of the logistics industry.

Table 2: Funding schemes of the Government for supporting ESG development in the logistics industry in Hong Kong

In addition, the Government will collaborate with the Hong Kong Logistics Development Council (LOGSCOUNCIL), industry associations, and other relevant stakeholders to amplify efforts in promoting the ESG roadmap, e.g. through industry events, conferences, digital campaigns and advocacy by industry leaders, amongst others.

The Government will also support the industry associations, tertiary and training institutions, among others, in stepping up training efforts and offering targeted training on logistics ESG, particularly with the Professional Training on Smart and Green Logistics Scheme. The targeted training may cover but not be limited to (i) introduction to ESG fundamentals; (ii) sector-specific relevance; (iii) importance of ESG data management; and (iv) international trends and standards.

Additionally, industry associations and other relevant organisations may establish networking and knowledge-sharing platforms and make use of funding under the Logistics Promotion Funding Scheme of the Government to organise interactive webinars, seminars, and workshops to exchange industry good practices, address challenges, and explore solutions. Industry roundtables will provide a forum for SMEs to engage in discussions on ESG trends, trade developments and collaborative opportunities.

Stage (1) Awareness Building			
Facilitation Overview	Facilitation Measures	Responsible Agent(s)	Implementation Time
(1) To strengthen publicity	<ul style="list-style-type: none"> To promote ESG roadmap and various Government initiatives for promoting ESG adoption (including relevant funding schemes) through various means 	<ul style="list-style-type: none"> Government / LOGSCOUNCIL Industry associations, etc. 	From 2025 Q2 onwards
(2) To provide informative resources	<ul style="list-style-type: none"> To launch an online ESG resource centre 	<ul style="list-style-type: none"> Government 	Within 2025 Q2
(3) To step up training	<ul style="list-style-type: none"> To provide more targeted training on logistics ESG 	<ul style="list-style-type: none"> Government / LOGSCOUNCIL Industry associations Tertiary and training institutes 	From 2025 Q2 onwards
(4) To foster knowledge sharing	<ul style="list-style-type: none"> To create networking and sharing platforms 	<ul style="list-style-type: none"> Government / LOGSCOUNCIL Industry associations Tertiary and training institutes, etc. 	From 2025 Q2 onwards

Stage (2):

Logistics ESG Schema Formation and Capacity Building



Goal for SMEs:

To be able to understand the data items which are relevant and important to logistics ESG reporting; and equip themselves with the capabilities to collect and record logistics ESG data effectively.

Capacity building in ESG data management is essential for logistics SMEs to effectively embark on their ESG journeys through a data-driven approach. To assist logistics SMEs in taking the initial steps towards embracing ESG initiatives and preparing them for sustainability reporting, the Government will provide a set of ESG data collection tools with an aim to facilitate effective collection and recording of logistics ESG data by SMEs.

Logistics companies are strongly recommended to consider designating an ESG officer or forming a working committee to lead and oversee the maintenance of logistics ESG data. The committee may consist of representatives from the accounting, human resources, and/or marketing departments within the company.

To ensure stakeholders, especially SMEs, understand and effectively use the logistics ESG data collection template, enhanced support will have to be provided through industry associations and training institutions to deliver targeted training programmes. Stakeholders in the logistics industry are encouraged to provide ESG training based on the data collection tools to help SMEs understand how they work, thereby facilitating their use and making it easier for logistics SMEs to collect ESG data. The provision of online training options may also be considered to offer self-paced training.

To encourage the industry to embrace the sustainability journey, and start collecting ESG data, the Government will continue to step up promotional effort to showcase the benefits and potential cost saving arising from adoption of ESG practices for SMEs.

Stage (2) Logistics ESG Schema Formation and Capacity Building

Facilitation Overview	Facilitation Measures	Responsible Agent(s)	Implementation Time
(1) To establish “template” for ESG disclosure	<ul style="list-style-type: none"> • To commence consultancy studies on formulating an ESG data collection schema for logistics SMEs • To design and publish the core logistics ESG schema • To produce a data dictionary to standardise terminology and facilitate data interpretation • To produce a data collection template aligned with the schema 	<ul style="list-style-type: none"> • Government / LOGSCOUNCIL 	Within 2025 Q3
(2) To provide training on the data collection	<ul style="list-style-type: none"> • To develop training materials and deliver training to ensure stakeholders (especially SMEs) understand and effectively use the data collection template 	<ul style="list-style-type: none"> • Government / LOGSCOUNCIL • Tertiary and training institutes • Industry associations 	To liaise with relevant stakeholders from 2025 Q2 onwards, with a target for the first training to be on offer within 2025
(3) To review data collection instrument	<ul style="list-style-type: none"> • To conduct regular review on the data collection schema to ensure alignment with global standards 	<ul style="list-style-type: none"> • Government / LOGSCOUNCIL 	Continuous
(4) To step up publicity on ESG benefits	<ul style="list-style-type: none"> • To sustain promotional effort with a focus on educating SMEs on the benefits that ESG adoption may bring 	<ul style="list-style-type: none"> • Government / LOGSCOUNCIL 	Continuous

Stage (3):**Capacity Enhancement****Goal for SMEs:**

To enhance capabilities in sustainability reporting and evaluation, and to ride the green transition.

By enhancing the skills and capabilities to collect, analyse and report ESG data, logistics SMEs can acquire valuable insights into their ESG impact, identify areas for improvement, and track progress towards sustainability goals. Suitable training could use the ESG data collection template as input and translate it into a basic, readable sustainability report as the output.

Through the use of these tools, it is envisaged that SMEs can enhance their capabilities in sustainability reporting and evaluation, and align with the green transition.

Stage (3) Capacity Enhancement

Facilitation Overview	Facilitation Measures	Responsible Agent(s)	Implementation Time
(1) To provide training on producing ESG report	<ul style="list-style-type: none"> To provide training on producing ESG report as an extension of the data collection template 	<ul style="list-style-type: none"> Government / LOGSCOUNCIL Industry associations Training institutions 	To liaise with relevant stakeholders from 2025 Q2 onwards, with a target for the first training to be offered by 2026 Q4

Concluding Remarks

The roadmap has set out a clear and simple pathway for logistics SMEs to initiate their ESG journeys and stay relevant in the sweeping trend of ESG compliance. It is hoped that by following the roadmap, logistics SMEs will start to collect and record ESG data and meet the relevant ESG disclosure requirements. However, data collection's true value lies in driving continuous improvements in ESG performance, and it should be viewed as the starting point for ongoing advancement. Through regular analysis of collected data, companies are expected to pinpoint areas for enhancement, set actionable targets, establish incremental goals, and nurture a culture of continuous progress that aligns with sustainability objectives. This ensures that ESG efforts remain dynamic and evolve over time, contributing to long-term positive changes.

The roadmap aims to provide an overall pathway to ESG development. It is inevitable that some companies will progress faster than others, and may be ready for the next stage of ESG development beyond what this roadmap encompasses. For instance, with the ESG data collected, companies may be able to benchmark their ESG performance with others' through, for example, ESG performance assessments that are available in the market. Conditions may also be ripe in due course for a recognition scheme to be introduced to show appreciation for companies that have actively participated in ESG data collection and/or peer assessment. Furthermore, case studies on high-performing logistics companies can be conducted to identify the industry's best practices for training and higher level of recognition.

The roadmap will be updated based on the results of a review on the progress of implementation of the present roadmap to be conducted within 2027. The review will involve gathering feedback from logistics SMEs and other stakeholders, and the next phase of the roadmap shall continue to align with the prevailing international ESG standards and requirements. Most importantly, the Mainland's ESG disclosure standards will likely have been clarified in the coming few years and if so, will be instrumental to the update of the roadmap.

With concerted effort to promote the adoption of this roadmap and ESG practices, green and sustainable logistics will prosper in Hong Kong and help to galvanise our position as a leading international logistics hub. As always, the Transport and Logistics Bureau, in collaboration with the LOGSCOUNCIL, will provide all necessary support to logistics SMEs and work closely with the industry and other stakeholders to smoothen for them the road to a greener and more sustainable future.

In the longer term, an ESG data registry for storing individual companies' ESG performance data for self-reference and improvement, as well as third-party assurance to ensure the credibility and accuracy of ESG disclosures may become necessary to help build trust among stakeholders and align with global best practices. By adopting a structured and supportive approach, the ESG roadmap can effectively guide Hong Kong's logistics sector, particularly SMEs, towards sustainable and compliant business practices.

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GS1 Hong Kong

Hongkong Association of Freight Forwarding And Logistics Limited

Hong Kong Logistics Association

The Chamber of Hong Kong Logistics Industry Limited

The Chartered Institute of Logistics and Transport in Hong Kong

The Hong Kong Shippers' Council

College of Professional and Continuing Education, The Hong Kong Polytechnic University

Vocational Training Council (Transport and Logistics Training Board)



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