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The Conservancy Association

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Ms. Wong Sean Yee, Anissa  
Director of Environmental Protection  
Environmental Protection Department  
Environmental Impact Assessment Ordinance Register Office

By E-mail: reo@epd.gov.hk

Dear Ms. Wong

Re: Comments on Development of the Integrated Waste Management Facilities (IWMF)  
Phase 1

The Conservancy Association (CA) would object to the EIA report regarding Development of the IWMF Phase 1.

### **1. Shek Kwu Chau Option**

#### **i. Adherence to EIA Principle**

With existing coral ground supporting marine ecosystem, together with habitat for White-bellied Sea Eagle and Finless Porpoise, Shek Kwu Chau is highly important in conservation. While admitting such ecological importance, the EIA report, however, still came to the conclusion that all environmental impacts would be acceptable through mitigation. It should be clearly evaluated again if the report strictly adhered to basic hierarchy of EIA, with “avoidance” on top priority. Applying this by claiming avoidance with direct contact with intertidal habitat and coastal subtidal habitat (Paragraph 7b.8.2.1 and 7b.8.2.2) would not true as marine water habitat was still completely left out.

CA further worries that subsequent environmental problems follows after constructing the IWMF in Shek Kwu Chau, such as odour and air pollution induced by doubling handling of wastes transportation. Besides, the site would be exposed to bad weather especially typhoon, thereby strongly impeding waste transportation.

#### **ii. Finless Porpoise**

Despite measures such as avoidance of peak season for Finless Porpoise occurrence, regulating vessel speed limit, adopting regular travel route, and so on, the fact is that both baseline survey and survey in this study have recorded high occurrence of Finless Porpoise in south and southwest waters near Shek Kwu Chau. While compensating permanent loss of habitat through proposing a 700-ha marine park in the waters between Soko Islands and Shek Kwu Chau, it should further assess designation of long-delayed marine park in Southwest Lantau and Soko Islands simultaneously to better conserve habitat for Finless Porpoise and other marine lives.

#### **iii. White-bellied Sea Eagle (WBSE)**

The point that “*The Tai Ngam Hau nest has demonstrated that WBSE has a certain level of tolerance from human disturbance and could achieve breeding success under human disturbance*” (Paragraph 7b.6.2.93) might over-simplify the characteristic of the nest. The breeding success in Tai Ngam Hau nest was due to the presence of fish culturing at Ma Lam Wat, 500m from the nest, which then enhanced the foraging ground, while dead fishes from the fish rafts also act as a food source for WBSE<sup>1</sup>. Even claiming that WBSE is a “*highly mobile species*” and “*the availability of similar (WBSE) habitat in the vicinity of the Project Site*” (Paragraph 7b.6.2.94) would be too vague to justify negligible impacts brought by the project. The threat on WBSE habitat brought by the project seems not to be taken into full account.

## **2. Tsang Tsui Option**

### **i. Little Grebe**

With the impact of both IWMF and West New Territories (WENT) Landfill Extension, the breeding habitat of Little Grebe would be deeply narrowed. Whether the 1.2 ha of the compensatory pond would be a buffer area for the unoccupied Middle Lagoon or a regenerated breeding habitat for Little Grebe is different. CA after all still remains skeptic of this compensatory pond for Little Grebe because it is too close to the proposed IWMF.

The fact to enhance wetland habitat in the southern unoccupied Middle Lagoon with a size of 4.5 ha is that it would process “*until the area is occupied by WENT Landfill Extension Project*” (Paragraph 7a.8.3.5). The mitigation plan (Figure 8.12 of EIA report of WENT Landfill Extension) also revealed that this part would be designated for compensatory planting. It is therefore doubtful if the Little Grebe habitat can be secured after WENT Landfill Extension.

### **ii. Air Quality**

It happens as if the EIA report has selectively revealed the ambient air quality condition by extracting the annual average concentrations of pollutants from Year 2005 to Year 2009 only. With reference to the air monitoring data at Yuen Long Station, it has long been recognized that the 1-hour O<sub>3</sub>, the 1-hour and daily NO<sub>2</sub>, annual TSP, the daily and annual RSP have often exceeded the Air Quality Objectives (AQO) levels. It was worried that even a slight increase in pollutant emission from IWMF, together with the planned sludge incineration and other existing emission sources, would not be tolerated as stipulated in the required emission standard.

**EPD Air Quality Monitoring Data at Yuen Long Station (2004-2008)**

<b>Pollutants</b>	<b>Year</b>	<b>Highest 1-hour Average (µg/m<sup>3</sup>)</b>	<b>Highest Daily Average (µg/m<sup>3</sup>)</b>	<b>Annual Average (µg/m<sup>3</sup>)</b>
O <sub>3</sub>	2004	289	102	31
	2005	313	133	35
	2006	335	116	32
	2007	327	119	32
	2008	298	128	35
NO <sub>2</sub>	2004	317	166	67
	2005	245	145	58

<sup>1</sup> Lee, W.H. & So, W.Y.I. (2010). Breeding Ecology of White-bellied Sea Eagle (*Haliaeetus leucogaste*, 白腹海鵰) in Hong Kong – A Review and Update. *AFCD Hong Kong Biodiversity 18*. [http://www.afcd.gov.hk/english/publications/publications\\_con/files/IssueNo18.pdf](http://www.afcd.gov.hk/english/publications/publications_con/files/IssueNo18.pdf)

	2006	307	198	58
	2007	279	137	55
	2008	239	133	56
TSP	2004	N/A	320	113
	2005	N/A	252	104
	2006	N/A	448	101
	2007	N/A	304	97
	2008	N/A	217	87
RSP	2004	366	225	71
	2005	354	212	62
	2006	293	246	62
	2007	341	207	64
	2008	-	164	60

Note:

- N/A – Not Applicable.
- Shaded area – Monitoring results exceeded the criteria of AQO.
- Data Extracted from Tuen Mun – Chek Lap Kok Link EIA Report ([http://www.epd.gov.hk/eia/register/report/eiareport/eia\\_1742009/html/Section%204%20Air%20Quality/Section%204%20-%20Air%20Quality\\_final%20310709.htm](http://www.epd.gov.hk/eia/register/report/eiareport/eia_1742009/html/Section%204%20Air%20Quality/Section%204%20-%20Air%20Quality_final%20310709.htm)) and Air Quality Statistics 2008 ([http://www.epd.gov.hk/epd/english/environmentinhk/air/data/aq\\_stat.html](http://www.epd.gov.hk/epd/english/environmentinhk/air/data/aq_stat.html))

### 3. Under-utilization of IWMF

A cursory review of the total handling tonnage of the 3 Refuse Transfer Stations (RTSs), namely Island East Transfer Station, Island West Transfer Station and West Kowloon Transfer Station showed that only about 3021 tonnes<sup>2</sup> per day on average of MSW and special waste are collected and therefore the incineration may run the risk of under-utilization if there is a drop in amount of waste brought by, for instance, increase in waste recycling percentage or change in routings of existing waste trucks. Although it may be argued that the 2009 figures of West Kowloon Transfer Station was lower than normal because of a fire accident occurred during that year, it should be reiterated that since the government has committed to raise the waste recovery rate of the Territory to 55%, it is all possible that total combustible waste received from these 3 RTSs will be lower than the daily throughput of the incinerator. If such a situation occurs, IWMF will be still underutilized. If IWMF is located in Shek Kwu Chau, waste from NLTS will need to be transferred to the Shek Kwu Chau incinerator, making the environmental cost of waste transfer higher than that predicted by the government when they planned the site there.

CA would still highlight that a holistic approach to handle waste problem, including speeding up the progress of Producer Responsibility Scheme, recycling, waste charging, is definitely necessary. Over-reliance of end-of-pipe measures would not be the answer to waste problem in long run.

Yours sincerely  
 Ng Hei Man  
 Senior Campaign Officer

<sup>2</sup> EPD (2010). Solid Waste Delivered to Waste Facilities in 2009. *Monitoring of Solid Waste in Hong Kong 2009*. <https://www.wastereduction.gov.hk/chi/materials/info/msw2009tc.pdf>