



長春社 since 1968

The Conservancy Association

會址：香港九龍吳松街 191-197 號突破中心 9 樓

Add.: 9/F., Breakthrough Centre, Woosung Street, Kowloon, Hong Kong

電話 Tel.: (852)2728 6781 傳真 Fax.: (852) 2728 5538

29th June 2011

The Secretary
Town Planning Board

E-mail: tpbpd@pland.gov.hk

Dear Sir/Madam

Comments on Shek Kwu Chau Outline Zoning Plan (OZP) (No: S/I-SKC/1)

The Conservancy Association (CA) is writing to submit our comments on Shek Kwu Chau OZP (No: S/I-SKC/1).

Regarding to item OU (IWFMF), it was noted that the EIA report on Development of IWFMF Phase 1 has been withdrawn on 11 May 2011. Since potential environmental impacts of the proposed IWFMF in Shek Kwu Chau would be subjected to re-evaluation, it would not be appropriate to introduce OU (IWFMF) in this stage.

CA would also like to express our grave concern on siting IWFMF in Shek Kwu Chau. 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. Finless porpoise (*Neophocaena phocaenoides*), listed as "Vulnerable" in the IUCN Red List of Threatened Species and CITES Appendix I, should require high level of protection. Since high occurrence of Finless Porpoise have been recorded in south and southwest waters¹, the proposed IWFMF might induce direct habitat loss. CA worries that even adopting mitigation measures such as avoidance of peak season for Finless Porpoise occurrence, regulating vessel speed limit, adopting regular travel route, and so on, might not prevent habitat degradation of Finless Porpoise.

¹AFCD (2010).

http://www.afcd.gov.hk/tc_chi/conservation/con_mar/con_mar_fin/con_mar_fin_fin/con_mar_fin_fin_dis_where.html. Access 23 June 2011.

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.

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 faithfully

Ng Hei Man

Senior Campaign Officer