



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

16<sup>th</sup> December 2011

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 still object to the EIA report regarding Development of the IWMF Phase 1. Our previous submission dated 18<sup>th</sup> March on the same project remained unchanged in large because the project proponent, Environmental Protection Department (EPD), did not make any changes in the EIA report. The so-called responses to public comment in Volume 5 merely repeat findings in the EIA report and CA did not feel any sincerity of EPD, also the gate-keeper of EIA, to face concerns raised by us.

### **1. Shek Kwu Chau (SKC) Option**

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

CA would still stick to our previous view that choosing SKC as a site for IWMF is not strictly adhered to basic hierarchy of EIA, with “avoidance” on top priority. It was unacceptable that while admitting such ecological importance the EIA report, however, still came to the conclusion that all environmental impacts would be acceptable through mitigation. We should reiterate that the proposed reclamation in SKC for IWMF would imply huge loss on an ecological treasure trove including coral ground, White-bellied Sea Eagle and Finless Porpoise.

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

Finless Porpoise, listed as “Vulnerable” in IUCN Red List of Threatened Species, has high occurrence in Hong Kong waters. Both previous study and existing EIA study (Figure 7b.10) had also recorded high occurrence of Finless Porpoise in south and southwest waters near Shek Kwu Chau. As said in the above, the principle of avoidance should be strongly adhered in view of area of high ecological importance. Insisting an IWMF in SKC under such strong scientific evidence is definitely contravene this principle and, worse still, harm the integrity of the entire EIA system.

Moreover, CA is not satisfied that no supplementary details has been provided on

conservation plan with management strategies on finless porpoise under the proposed 700-ha marine park. 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)**

CA was disappointed with EPD response as it repeated that various mitigation measures would be applied, but not fully respond to our query on WBSE habitat. 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>. Such background would be clear to conclude that it was not appropriate to compare SKC with Tai Ngam Hau.

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. Especially when referring to the statement that *“the possibility of WBSE nest abandonment still remains”* (Paragraph 7b.9.1.6), it was clear that EPD should not ensure no residual impacts based on such unprofessional justification.

## **2. Tsang Tsui Option**

### **i. Little Grebe**

To secure habitat of Little Grebe, EPD claimed that apart from the 1.2 ha of the compensatory pond together with 4.5 ha of enhanced wetland habitat, *“at least 8 ha of compensatory freshwater ponds would be created in the WENT Landfill site under the WENT Landfill Project”*. It should be however critically noted that such compensation measure was only based on WENT Landfill EIA and should not be mixed up with any compensation measures under IWMF. The conclusion that *“the loss of Little Grebe habitat in Middle Lagoon due to IWMF Project would be fully compensated by the provision of these 8 ha wetland areas”* (Paragraph 7a.8.3.1) is definitely not justified.

CA’s query on the compensation measure on Little Grebe remained unsolved. We are highly skeptic of the function of the 1.2 ha of the compensatory pond which is described as a buffer area for the unoccupied Middle Lagoon (Paragraph 7a.8.3.3) rather than a regenerated breeding habitat for Little Grebe. More importantly, this compensatory pond is located too close to the proposed IWMF so that whether it would serve any ecological function is dubious.

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

---

<sup>1</sup> Lee, W.H. & So, W.Y.I. (2010). Breeding Ecology of White-bellied Sea Eagle (*Haliaeetus leucogaster*, 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)

compensatory planting. CA is greatly discontented of EPD's response by repeating details of EIA content but not clarifying facts and re-assessing potential ecological impacts.

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