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The Conservancy Association

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Incorporated in Hong Kong with limited liability by guarantee)

27th July 2017

Mr. Tong Chi Keung, Donald

Director of Environmental Protection

Environmental Protection Department

Environmental Impact Assessment Ordinance Register Office

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

Dear Mr. Tong,

RE: Comment on Mai Po Nature Reserve Infrastructure Upgrade Project - Project Profile

The Conservancy Association (CA) would like to express our concerns on the captioned.

1. Compliance with “no-net-loss in wetland” principle

The subject site lies in Wetland Conservation Area (WCA) according to Town Planning Board (TPB) Guideline No. 12C so that “no-net-loss in wetland” principle should be strictly adhered. The project proponent should justify how the project would comply with “no-net-loss in wetland” principle, and assess whether WCA and Wetland Buffer Area (WBA) would be affected by the project and associated works.

2. Limited description on potential impacts

This Project Profile merely uses 1 page (Table 3-1) to describe potential source of environmental impacts, but fails to state direct/indirect impacts during construction and operation phase in details. It also does not adequately identify any possible impacts arise from the improvement work, such as permanent/temporary loss of habitat, habitat fragmentation, disturbance caused by visitors on avifauna, and so on. We worry that the ecological impact would be under-estimated when conducting

environmental assessment in future. Some of our concerns are listed below.

2.1 Construction of new “circular route” footpath

From Figure 1-2 of the Project Profile, the proposed new “circular route” footpath would intrude gei wai #6 and #7. While the detailed design of the footpath is still unknown, it is doubtful if potential habitat loss would be resulted due to construction and operation phase. Particularly, if concrete footing and column would be adopted, it could be irreversible impacts to the wetland habitats. The Project Profile, however, fails to identify potential direct and indirect habitat loss caused by the proposed work. Figure 1-2 also reveals that part of the proposed footpath would be close to the Black-faced Spoonbill roost area. Human disturbance by, for example, various visitors’ activities can be obvious during operation phase of the work. We do not understand why such impacts would not be expected according to the Table 3-1 of the Project Profile.

CA would strongly suggest the followings to be included in the future assessment:

- i. Both direct and indirect habitat loss, as well as fragmentation of habitat due to the proposed footpath should be evaluated.
- ii. Appropriate measures should be suggested to avoid/minimize or mitigate any potential adverse impacts and human disturbance.

2.2 Widening of the existing footpath

Section 1.4.7 states that “*Where space permits, the footpath will be widened by 0.15m (to 1.65m) or 1.8m (to 3.3m)*”. It is not sure if the trees and wetland along the footpath would be directly affected. While viewing or seating areas would be provided according to Section 1.4.7, it has not been mentioned clearly in Section 3.2 which only describes how the widening work of footpath would be implemented.

CA would suggest the followings to be included in the future assessment:

- i. Justification of the widening work of footpath, provision of additional viewing or seating areas should be stated.
- ii. The exact work area should be identified to evaluate if trees and wetland along the footpath would be encroached.
- iii. Potential ecological impacts by the widening work should be addressed, particularly by evaluating minimizing its scale.

2.3 Impacts by the temporary access for construction traffic

From Table 3-1 of the Project Profile just briefly stated that terrestrial ecological

impacts would be likely but not significant during construction, but does not clearly identify potential disturbance due to the access of construction traffic along existing bunds. Even the access is temporary in nature, it would pass through pond #16, #17 and #20 where the key ecological sensitive receivers are located. In this way, we hope that special attention would be put on assessing ecological impact on the adjacent key ecological sensitive receivers and waterbirds during construction phase.

3. Demolition and re-construction of the Peter Scott Field Studies Centre (PSFSC) near MPNR

Regarding the demolition and re-construction of PSFSC, its commencement (start in April 2018 for re-occupation in January 2021) would be overlapped with that of the subject upgrade project. While the detailed plan of the PSFSC work is currently not available, it is unsure if how its potential adverse impacts or disturbance would be mitigated, and its cumulative impact can be. We would suggest that cumulative impact due to other planned and committed development projects, including the demolition and re-construction of PSFSC, should be evaluated.

Mai Po Ramsar Site is an internationally recognized wetland so that any works within the area should be strictly evaluated. While we hope that the above concerns would be seriously taken into consideration, both the project proponent and EPD would also have to consider if a revised Project Profile is necessary to ensure ecological integrity in Mai Po wetland.

Yours sincerely,

Ng Hei Man

Campaign Manager