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**生態教育及資源中心**  
Eco-Education & Resources Centre

**BY EMAIL AND BY FAX**

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5 November, 2015

Dear Ms. Wong,

**Project Profile of  
Planning, Engineering and Architectural Study for Topside Development at  
Hong Kong Boundary Crossing Facilities(BCF) Island of  
Hong Kong-Zhuhai-Macao Bridge – Feasibility Study**

Green Power and Eco-Education and Resources Centre would like to comment on the above-captioned Project Profile (PP) under Environmental Impact Assessment (EIA) Ordinance:

**Air Pollution**

1. With thirty ongoing/potential development of major infrastructures on North Lantau (listed in section 2.3.1, PP), air quality of Tung Chung, which is also located on North Lantau, has been deteriorating remarkably. In 2014, Environmental Protection Department recorded 355 hours with Air Quality Health Index of General Air Monitoring Stations (the Stations) equal to 10 or 10+ levels in the territory. Tung Chung, the only Station on Lantau 3km away from the BFC Island, occupied 56 out of 355 hours which was the highest amongst of all the Stations.
2. Air quality of North Lantau is of grave concern regarding any further developments on North Lantau and adjoining water. The above-captioned proposed project (the Project) will worsen the air pollution of Tung Chung during the construction phase by emissions from the construction site, associated vessels, vehicles and machineries, and the operation phase when a daily patronage of 9200 to 14000 vehicles is projected in Year 2016 (section 1.2.1, PP).
3. Therefore, in order to safeguard the air quality and the health of residents in Tung Chung and North Lantau, we opine that the Project shall not use any of the land area on North Lantau including Tung Chung, Tin Sam, Hau Hok Wan, Sha Lo Wan, Sham Wat, Tai Ho Wan, Siu Ho Wan, Yam O Wan, Tsing Chau Wan as works area, vehicle parking, equipment storage or other related activities (especially concrete batching plant). The vehicles, vessels and machineries associated with the Project should not be allowed to access to Lantau Island. The above-mentioned vehicles and machineries, whatever being associated with the Project or not, should also be prohibited from using the road access linking Tai Ho Wan and/or North Lantau to BCF Island.

### **Forbid the Associated Construction Activities and Facilities on Lantau**

4. As mentioned in section 3.3.12 of PP, *“the transportation of construction materials will largely depends on the link roads connecting to the HKBCF Island”*. We are gravely concerned that the link road to Lantau will attract and facilitate massive uncontrollable and environmentally damaging dumping on Lantau Island of construction & demolition (C&D) wastes generated from BCF Island. In fact, dumping of C&D waste have already been occurring in places such as Tung Chung West and Pui O on Lantau that has destroyed ecologically valueable wetlands, imposed flood risk to settlements, polluted natural rivers and seashores.
5. As most areas on Lantau have not yet been covered by any statutory land use plans, no effective and efficient enforcement can be executed in most past incidents. As a result, the dumped wastes are hard to remove and the dumping sites are very unlikely to be reinstated. In many cases, the dumping sites have been taken up for further incompatible developments such as open storages, e.g. those in Shek Lau Po, Tung Chung.
6. In order not to impose uncontrollable development pressures on North Lantau, a clause forbidding proliferation of incompatible land uses on North Lantau was included in the Environmental Permit (EP-352/2009/A) of Hong Kong-Zhuhai-Macao Bridge Hong Kong Link Road project:

*“3.2 The Permit Holder shall not use any of the land area in Sham Wat, Sha Lo Wan, Hau Hok Wan and San Tau as works area, vehicle parking, equipment storage or other related activities.”*

This clause should be automatically extended to this Project because this Project is an extension works of Hong Kong-Zhuhai-Macao Bridge Hong Kong Link Road project.

7. Therefore, to be consistent and to protect the environment, ecology, air and water quality, and natural landscape of Lantau from the adverse impacts of the Project, we stress and re-iterate our recommended measures stated in paragraph 3 of this letter.
8. We object to the above-captioned project if our recommended measures to prevent environmental deterioration of Lantau consequential to the this Project stated in paragraph 3 of this letter are not adopted as clause(s) in the Study Brief and Environmental Permit under Environment Impact Assessment Ordinance.

### **Waste Treatment**

9. The PP has not estimated the amount of wastes, especially C&D wastes, generated in the Project but huge amount should be foreseen. Owing to our concerns stated in paragraph 4 and 5, we disagree that these wastes should be transported to waste treatment/sorting/disposal facilities via road access, particularly the one linking Tai Ho an and/or North Lantau to BCF Island.
10. The wastes generated by the Project should be transported by sea to waste treatment/sorting/disposal facilities with statutory control and monitoring regarding the navigation routes and activities of vessels to prevent any waste dumping at sea or on seashores on Lantau.

## Ecology

11. Section 3.3.9 stated that surface runoff and effluent of proposed sewage treatment works (STW) will be discharged through the outfall located at the seawall on BCF Island. Thermal water and biocide will also be discharged from cooling system if seawater is adopted as the cooling media.
12. The contaminated stormwater/surface runoff, effluent of STW, thermal water and biocide discarded from BCF Island during both construction and operation phase will be dispersed by current and tide and reach the water of ecological importance in Tung Chung Bay, Tai Ho Wan, Yam O Bay (refer to paragraphs under **Threats to Pipefish**) and adversely affect the ecology and fishing resources of these locations. The larvae of marine life, including those of commercial fisheries species, are highly vulnerable.
13. Therefore, the discharge points and the water quality of such runoff/stormwater/effluent must be cautiously located, designed and controlled to avoid polluting North Lantau water, particularly Tung Chung Bay, Tai Ho Wan, Yam O Bay, and existing and planned Marine Parks, including Sha Chau-Lung Kwu Chau, Brothers and proposed Marine Park under Three-Runway System project.
14. Tung Chung Bay which is the spawning and nursery ground of commercial fisheries species and Yam O Wan (refer to paragraphs under **Threats to Pipefish**) which is the only known habitat of Alligator Pipefish, *Syngnathoides biaculeatus*, should be specified as both Potential Water and Ecological Sensitive Receivers.
15. The impacts of air & noise pollution generated by the heavy traffic, especially through Tuen Mun-Chek Lap Kok Link, and the water pollution on the Tai Ho Wan and Tai Ho Stream Site of Special Scientific Interest, and Tuen Mun district must be avoided in the construction and operation phase.
16. No additional reclamation, construction areas and marine traffic should be proposed to prevent further threats to the marine ecology, especially Chinese White Dolphin, *Sousa chinensis*.

## Threats to Pipefish

17. Pipefish belongs to the same family of seahorse, Family Syngnathidae, which is under the threats of by-catch from trawling, collection for medicine and aquarium pet, and habitat destruction. Green Power & Eco-Education and Resources Centre conducted a pilot research on pipefish in Hong Kong waters from 2011 to 2012 (refer to the attachment).
18. As pointed out in our study, pipefish are mostly observed in coastal waters in western Hong Kong. Alligator Pipefish, *Syngnathoides biaculeatus*, was found in Sunny Bay (Yam O Wan). It should be noted that its distribution and the population in Hong Kong were unclear. The discovery of *Syngnathoides biaculeatus* at Sunny Bay was the first record of this species in western Hong Kong waters.
19. Sunny Bay is the only known habitat of Alligator Pipefish (*Syngnathoides biaculeatus*) in western Hong Kong water. The survival of these restricted local population of Alligator Pipefish will be threatened by the sewage and oil discarded and/or leaked from the facilities and/or associated vessels and marine traffic.

20. Therefore, we urge the Administration to protect the habitat of Alligator Pipefish in Yam O Wan through our recommended measures stated in paragraph 3 of this letter.

### **EIA Report**

21. Statutory EIA should base on the final Recommended Outline Development Plan (RODP) and should not proceed after the Stage 1 Community Engagement (CE1) because material changes of draft RODP may happen during the Stage 2 Community Engagement (CE2). The Advisory Council on the Environment and the general public cannot advise on the changes resulting from CE2 through statutory EIA process once the inspection period terminated for EIA report of the draft RODP formulated in CE1. Therefore, statutory EIA process should only proceed after the CE2 when there is a public consensus about the development proposal.

### **Carrying Capacity**

22. The carry capacity of Tung Chung and Tuen Mun new town to accommodate the additional visitors generated by HKBCF, including tourists, parallel goods traders, consumers purchasing daily products, should be assessed and residents of these districts should be fully consulted.

Thank you very much for your kind attention.

Yours faithfully,  
For and on behalf of  
Green Power and Eco-Education & Resources Centre



Cheng Luk Ki, Ph.D.  
Division Head, Scientific Research and Conservation

Encl. *A Summary of Pilot Research – Searching for Pipefish in Hong Kong*

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