



BY EMAIL ONLY

Mr. Donald, C.K. Tong, JP
Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
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Dear Mr. Tong,

Hong Kong Offshore LNG Terminal EIA Report


Green Power would like to draw your kind attention to our concerns about the above-captioned EIA Report under EIAO.

1. In order to avoid triggering uncontrollable development pressures on Lantau, specially South Lantau, and other outlying islands, the project proponent, their contractors and subcontractors should not use any of the land area in South Lantau coast from Discovery Bay to Fan Lau and Kan Tau Au, and in Yi O, Tai O, Sham Wat, San Shek Wan, Sha Lo Wan, Hau Hok Wan and San Tau, and undeveloped areas on the outlying islands as works area, vehicle parking, vessel berthing, equipment storage, stock piling or other activities related to proposed works. This practice is particularly important in those areas without enforceable statutory landuse plans, e.g. South Lantau coast.
2. The proposed works and associated works and vessels should not encroach the designated and proposed Marine Parks. The speed of associated vessels should be restricted near the designated and proposed marine parks, and hot spots or foraging areas of dolphins. Effective boat speed surveillance system should be in place.
3. Measures, personnel and relevant resources to prevent, monitor and repair leakage of natural gas from the Floating Storage and Regasification Unit (FSRU) and subsea pipes should be formulated to avoid wastage of fuel, emission of greenhouse gases, which are also volatile organic compounds that can exacerbate ozone pollution in the territory.
4. Measures, personnel and relevant resources to prevent, monitor and remediate the fuel(diesel) and chemical spill should be formulated to avoid impacts on dolphins, marine life, fishery and bathing beaches in case if any incidents.
5. Extent of seabed dredging, the amount of seabed mud dredged and disposed of should be closely monitored to avoid unnecessary adverse environmental impacts and dumping at non-specified sites. The suspended solid level of sensitive receivers should be measured before and during the operation of dredging, transportation and disposal of seabed mud, in addition to regular/routine monitoring.

6. Undersea noise level should be monitored during the works procedures generating high level of noise, e.g. percussion. Associated works should stop if undersea noise levels are unacceptable at proposed or designated Marine Parks. Works generating high undersea noise should be forbidden at night.
7. With huge volume of seawater being pumped, filtered, cooled, chlorinated and discharged day by day in the FSRU, the basis of marine food web such as planktons, larvae of fishes, mollusks will be adversely impacted. In turn, the higher consumers, especially Chinese White Dolphin (*Sousa chinensis*), Finless Porpoise (*Neophocaena phocaenoides*) and fish fry, in the food chain will suffer from the operation of the facility. Monitoring of larvae of marine creatures should be in place before and during the construction and operation phase in proper locations and proposed and designated Marine Parks.
8. Alternative antifouling agents should be explored to replace chlorine or hypochlorite in regasification process that will generate chlorinated organic compounds which are not readily biodegradable and able to accumulate in marine creatures and seafood through food chain. Human intake of seafood contaminated with chlorinated organic compounds may run a risk of cancer or other health effects.
9. As most project sites are very remote, effective measures to monitor and prevent waste dumping at sea and discharge of wastewater or chemical must be taken.

Thank you very much for your kind attention.

Yours sincerely,



CHENG Luk-ki
Director