



BY EMAIL ONLY

Director of Environmental Protection

EIA Ordinance Register Office

Environmental Protection Department

(E-mail: eiaocomment@epd.gov.hk; Fax: 2147 0894)

23 October, 2018

Dear Sir,

**Project Profile for
Yuen Long Effluent Polishing Plant (YLEPP)**

Green Power would like to draw your attention to our concerns about the above-captioned project.

1. Although YLEPP will incorporate process of a higher degree of suspended solids, nitrogen and phosphorus removal, the effluent should not increase the pollution loading for water quality of Deep Bay Area. Also, in order to avoid impacts of potential harmful pollutants remained in the effluent, regular ecotoxicity monitoring should be conducted for main/key taxa near to the outfall(s).
2. Surface runoff generated from the site during construction phase should be prevented from discharging into neighbouring river channels, stormwater drainage, fishponds and wetlands directly. We agree that related mitigation measures should be incorporated into the specifications of the works contract.
3. The amount of solid wastes, such as C & D wastes, soil and rocks, generated from the proposed project has not been mentioned in the project profile. As most of the areas adjoining the project site are remote countryside places and fishponds, any fly-tipping of such solid wastes generated from this project will be hard to combat. Even if such incidents are spotted, reinstatement can seldom be implemented because of various reasons such as land ownership, landuse zoning and etc. Therefore, generation, transportation and disposal of such solid wastes should be under stricter control. The mitigated measures to prevent illegal and environmentally vandalistic dumping of wastes generated from the proposed project should be considered to be incorporated into the specifications of the works contract.
4. The location of the project site is close to the confluence of Shan Pui River and Kam Tin River New Channel and the abandoned fishponds in the channel of Shan Pui River where high number of birds is seen foraging, especially in winter. Therefore, the construction site facing the river channel should be well masked. Disturbing and noisy construction procedures of the proposed project should be restricted to non-wintering period in order to avoid the peak period of migratory birds in Deep Bay area/Ramsar Site and to minimize the disturbance to migratory birds.

5. Mai Po Bent-winged Firefly, *Pteroptyx maipo*, is endemic to Hong Kong and has restricted distribution around Deep Bay, it is thus considered as a potential species of conservation concern in other projects at Deep Bay area. The proponent should assure that the proposed project will not pose any impacts on the endemic firefly species during both the construction and operational phase, such as glare disturbance at night, pollution of river/pond water, destruction of habitat by vegetation clearance and/or waste dumping.
6. The mangrove, reed bed and trees should be properly protected from any damages brought about by the proposed project against machineries, earth works, vehicles, piling of materials, etc. Burning of any materials and smoking should be prohibited in the works site of the project to avoid destruction of habitats by fires.
7. Measures to prevent generation of odour during transport of food waste to YLEPP should be proposed.
8. Safety design and measures should be in place to deal with any cumulation/evolving of hazardous gas, especially in enclosed spaces in the site during both construction and operational phase.
9. Additional greening design should be incorporated for the aims of alleviating heat island effect, enhancing conservation values and promoting public enjoyment of natural assets.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 39610200, F: 2314 2661, Email: lkcheng@greenpower.org.hk).

Yours faithfully,



CHENG Luk-ki
Director
Green Power