



BY EMAIL ONLY

Director of Environmental Protection

EIA Ordinance Register Office

Environmental Protection Department

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

25 October, 2018

Dear Sir,

**Project Profile for
Upgrading of Remaining Sections of Kam Tin Road(KTR) and Lam Kam Road(LKR)**

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

1. While the project proponent mandates the contractors to set up “*vehicle wheel and body washing facilities at site exits*” which will generate murky and probably toxic wastewater (Sec.5.1(a)), no corresponding clauses are proposed to incorporate in the contract to prohibit the contractors to discharge such wastewater to water channels (Section 5.5). We opine that such clauses are important to protect the water quality of Kam Tin River and Deep Bay, and not to breach the “zero discharge” policy of Deep Bay Area.
2. More concrete measures and surveillance plans should be proposed to prevent *construction site runoff, debris, refuse, liquid spillages and sewage effluent* (Sec. 3.6) from discharging into river channel directly, through stormwater drains or surface runoff.
3. More concrete measures and surveillance plans should be proposed to prevent construction and demolition waste and other wastes generated from the project from dumping improperly, e.g. illegally dumping in farmlands or ponds, flytippings, even acquiring the acknowledgement from Director of Environmental Protection under Section 16B and C of Waste Disposal Ordinance.
4. Although mitigation measures proposed will make reference to the ecological survey results (Section 5.11), neither the survey results nor the mitigation measures are disclosed in this Project Profile. The survey period has also not been mentioned. Therefore, the effectiveness of measures to *avoid, minimize and compensate* the ecological impacts has no ground to judge. This contradicts the legislation intention of Environmental Impact Assessment Ordinance.
5. We question whether any trees will be affected by the proposed project and any tree survey has been conducted.

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