

25 March 2019

Dear Chairman and Members of Panel on Development of Legislative Council,

**Updated survey findings indicate the ecological importance of East Lantau waters  
Groups urge the Government to abandon “Lantau Tomorrow”**

The Government is planning to discuss issues related to artificial islands in the central waters in Panel on Development of Legislative Council on 26 March, while announcement of the preliminary estimated cost for “Lantau Tomorrow” was made on 19 March. In response to the above, we (seven environmental and concerned groups) would like to report our preliminary findings of ecological surveys and argue against the Government’s claim of “central waters is relatively ecologically less sensitive”.

We have conducted ecological surveys on Sunshine Islands and in surrounding waters during the winter of 2018/19. Preliminary findings indicate the area is of conservation importance both on land and in the sea. We have recorded an active nest of the nationally Class II protected White-bellied Sea Eagle and the Bogadek’s Burrowing Lizard endemic to Hong Kong on Sunshine Island, and also the very rare Sea Pen in the central waters. These findings reflects the East Lantau waters is of ecological importance. However, the Government claimed the East Lantau waters is of low ecological sensitivity without thorough and comprehensive investigation and research. This clearly underestimates the ecological value of the area and misleads the general public to support the reclamation project. Understanding the ecological importance of an area requires long-term monitoring, research and study, which cannot be replaced by just one or two Environmental Impact Assessments. We are deeply concerned reclamation will not only irreversibly alter the marine environment, but also directly threaten marine and terrestrial wildlife. We urge the Government to abandon the reclamation plan and develop brownfields first.

Adverse impacts on rare species endemic to Hong Kong

Sunshine Island is an important site for the Bogadek’s Burrowing Lizard, which is a reptile species endemic to Hong Kong (i.e. no other records globally), and it is only found on Sunshine Island, Shek Kwu Chau and Hei Ling Chau. The Government even designated Sunshine Island as a Site of Special Scientific Interest (SSSI) for the conservation of this species. We are in grave concern that the associated potential impacts of the development, such as increase in human disturbance and introduction of invasive species, may cause detrimental impacts on this endemic species, or in the worst case scenario, may even wipe out the whole population on the islands, and globally.

Adverse impacts on the rare coral particularly found in central waters

The East Lantau waters has always been under studied. Yet we recorded the very rare Sea Pen *Pennatulacea* (海筆) during our diving surveys last year. This type of coral was not recorded or found in surveys conducted in others areas of Hong Kong waters. Little is known for Sea Pen both locally and globally due to their retractable and hidden characteristic. We are concerned the reclamation works would have direct adverse impacts on the rare coral community and benthic organisms in the area.

Adverse impacts on local breeding birds

White-bellied Sea Eagle has an estimated population of about 30 individuals in Hong Kong. As they are sensitive to human disturbance during the breeding season, they often select uninhabited coastlines or offshore islands for nesting and breeding. Hong Kong is an important breeding ground in

Southern China, while the active nest at Sunshine Island is quite a recent discovery in the East Lantau waters. There is also a nesting colony of egrets and herons on Little Green Island since 2004. We are concerned the large scale reclamation works and the proposed road connection from Kennedy Town would have great disturbance on breeding and foraging grounds of birds, which in turn would affect their breeding success and the viability of their population in Hong Kong.

**Past developments records indicate ecology and wildlife were inadequately protected**

East Lantau waters is an ecologically sensitive area and should be conserved. However, previous coastal developments demonstrate that marine habitats and wildlife cannot be adequately protected. Even though the reclamation in the North Lantau waters were approved and implemented according to the issued environmental permit, Chinese White Dolphin in North Lantau waters dropped significantly and have eventually disappeared since 2015, while their total number in Hong Kong reached a historical low of 47 individuals in 2017. Given that there is little surveying effort in the East Lantau waters, we consider that “conservation first, development later” and precautionary principles should be adopted for any development.

**Adverse impacts of Lantau Tomorrow on surrounding ecological environment**

Even though the first stage of Lantau Tomorrow is now proposed to connect to Lantau at Sunny Bay, we are concerned the road links will eventually reach Mui Wo and other areas of South Lantau as the development plan proceeds. This contradicts and jeopardizes the Government’s pledge to conserve South Lantau. The subsequent transport load will destroy the pristine and tranquil South Lantau by deteriorating the air quality with vehicular exhaust emissions, facilitating fly-tipping of waste transported from construction works of/on the artificial islands and encouraging unplanned, chaotic and incompatible developments on South Lantau.

**Brownfield first**

Our natural environment is an important element of the quality of life in Hong Kong. Given that there are still many other land supply options available, the Government should not consider the option of reclamation as it will bring irreversible and permanent adverse impacts on the environment. Development of brownfields received the most support from the public with an estimated cost of just 33.3 billion, which is about one-fourth of the cost for reclamation. This can provide 139,000 public housing flats, at the same time phase out brownfield operation and protect the countryside.

Lastly, we would like to reiterate that there should be no conflict between protecting the sea and providing adequate housing. We urge the Government to abandon the reclamation plan, fully utilize all brownfields and vacant lands, and be determined to fix loopholes in the current housing, economy and planning system.

**Environmental and concerned groups include (in alphabetical order):**

The Conservancy Association  
Designing Hong Kong  
Greenpeace East Asia - Hong Kong office  
Green Power  
The Hong Kong Bird Watching Society  
Hong Kong Dolphin Conservation Society  
Save Lantau Alliance