



BY EMAIL ONLY

Director of Environmental Protection

EIA Ordinance Register Office

Environmental Protection Department

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29 March, 2019

Dear Sir,

**EIA Report for
Yuen Long Effluent Polishing Plant (YLEPP)**

Green Power would like to draw your attention to, and re-iterate our concerns in our response to Project Profile dated 23 October, 2019, about EIA report of the above-captioned project.

1. Green Power supports upgrading treatment level and capacity of Yuen Long Sewage Treatment Works to cope with the increasing sewage volume of Yuen Long and Kam Tin District and improve the water quality of Deep Bay and Shan Pui River(Yuen Long Nullah) to fulfill the requirement of “No Net Increase in Pollution Load to Deep Bay”.
2. We also appreciate the provision of facilities and measures in YLEPP to improve the sustainability, including
 - (a) collection and treatment of the polluted runoff from dry weather flow interceptor system from Yuen Long Creek(Yuen Long Nullah),
 - (b) co-digestion of organic wastes with sewage sludge within YLEPP to enhance energy recovery.
 - (c) reuse of treated effluent for chemical preparation, water supplement to deodorisation units and cleaning of treatment equipment in daily operation and maintenance of YLEPP.
3. In order to avoid impacts of potential harmful pollutants remained in the effluent of YLEPP, regular ecotoxicity monitoring are suggested for main/key taxa near to the outfall(s) during operation phase.
4. Surface runoff generated from the site during construction phase should be monitored and 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.
5. Pollution of groundwater should be avoided which will affect the water quality of neighbouring fishponds and impact the aquaculture.

6. As most of the areas adjoining the project site are remote countryside places and fishponds, any fly-tipping of 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.
7. 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.
8. The workers, personnel and activities related to the construction of YLEPP should not be exposed to the waterbirds foraged in the Shan Pui River channel.
9. 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.
10. 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.
11. 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