



**BY EMAIL ONLY**

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6 February, 2020

Dear Sir/Madam,

**Protection of Pipefish Habitat at Sunny Bay against  
Proposed Road P1 (Tai Ho - Sunny Bay Section) Development**

Green Power would like to raise our grave concerns about the above-captioned road development on North Lantau.

1. The Administration has proposed to commence the Engineering Study on Road P1 (Tai Ho – Sunny Bay Section) with the justifications of relieving the traffic pressure on the North Lantau Highway, coping with the housing and economic developments at North Lantau, and enhancing the resilience of the North Lantau transport network. The proposed Road P1 is about 12 km long in total, with two sections which are about 2.5 km of Tung Chung to Tai Ho Section and about 9.5 km of Tai Ho to Sunny Bay Section.

2. The proposed Road P1 is a designated project under Schedule 2 of the Environmental Impact Assessment Ordinance (Cap 499) (EIAO). The Administration is required to apply for an Environmental Permit for the construction and operation of the project. An EIA study, including ecological impact assessment, should be conducted to comply with the requirements of the EIAO.
3. Although Sunny Bay are not traditionally recognized as the ecologically important sites, the ecological values of the coasts may have long been underestimated. According to the results of an underwater visual census conducted by the Eco-Education & Resources Centre and Green Power in 2012 (refer to the Attachment), a sexually mature individual of Alligator Pipefish, *Syngnathoides biaculeatus* (擬海龍), was firstly recorded in the coast of Yam O (Sunny Bay). This was the first record of *S. biaculeatus* in the western Hong Kong waters.
4. Like many other pipefish species, *S. biaculeatus* is of increasing conservation value because it is heavily traded in the Chinese medicine market. We are concerned about the potential impacts induced by the construction of the captioned road development, that may cause severe disturbances to the very likely important habitats and nursery ground of these threatened pipefishes at the Sunny Bay and its adjacent coastal areas.
5. Since the captioned road development is a designated project under the EIAO, we urge the Administration to consider the need, alternative options and alignments of the proposed project, and to conduct a comprehensive ecological study in the statutory EIA process. In particular, the up-to-date population and status of pipefishes along the coasts of the project areas should be assessed. Effective conservation and mitigation measures, if any, shall be conducted in prior to development to protect the habitats of pipefishes affected by the proposed project.

Should you have any questions, please feel free to contact me at 3961 0200 or via [lkcheng@greenpower.org.hk](mailto:lkcheng@greenpower.org.hk).

Thank you for your kind attention. I look forward to your favourable reply.

For and on behalf of  
Green Power and Eco-Education & Resource Centre,



CHENG Luk-ki  
Director, GREEN POWER