



BY EMAIL ONLY

Ms. Maisie Cheng, J.P.
Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
(E-mail: eiaocomment@epd.gov.hk)

16 September 2020

Dear Ms. Cheng,

Project Profile for Drainage Improvement Works in Mui Wo

Green Power would like to draw your kind attention to our comments about the above-captioned Project Profile.

1. The captioned project will induce a prominent and substantial alternation in hydraulics of Mui Wo's drainage system (MWDS), but the detailed design and operating mechanism of the proposed penstock, pumping station, and tidal barrier that are influential to the river's hydraulics are missing from the Project Profile. Green Power is of grave concern whether the normal flow of the three rivers involved in the captioned project can be maintained all year round, which is critical to sustaining good water quality and healthy river habitat for wildlife. The project proponent shall demonstrate and explain further the anticipated change in hydraulics in the MWDS at the operation phase with the support of sufficient baseline hydrometric data. One key issue is to maintain the connectivity of rivers from the upper course to river mouth.
2. The MWDS and its adjoining farmland area have established an aquatic eco-system for aquatic lives including water birds, freshwater fish and dragonflies, the ecological impacts to the river-dependent sensitive receivers shall be fully assessed and mitigated. A comprehensive tree survey should be covered in the EIA. Translocation or falling of existing trees shall only be considered in the last resort.
3. The water quality of the Mui Wo River was graded as "Excellent" in 2018¹, the project proponent should be responsible for maintaining the good water quality in the MWDS. Any connection of additional water outfalls to the channels of the captioned project should be strictly prohibited during both the construction and operation phase.
4. Apart from the guidelines quoted by the project proponent in Section 3.2.6, supplementary guidelines should be formulated and adopted to avoid or mitigate the impacts on water quality and/or ecology in both construction and operation phase, if any environmental and ecological impacts are identified in the EIA.

5. Regarding the proposed river revitalization works, the project proponent shall evaluate the effectiveness of the previous river ecological enhancement works implemented at the Pak Ngan Heung River. The need to construct an artificial fish ladder at the Tai Tei Tong River should be justified by ecological and hydraulic assessment. Moreover, the proposed fish ladder, flood wall and gabion wall should be compatible with the natural river environment and ecologically friendly. The project proponent is highly recommended to liaise with green groups in formulating the river revitalization plan.
6. Fly-tipping and illegal dumping in farmlands, wetlands and other ecologically sensitive areas are proliferating in the South Lantau and such vandalism cases have been frequently spotted and reported without proper enforcement and reinstatement. Green Power is gravely concerned about the transportation and disposal of any solid waste generated from the captioned project. We urge the project proponent to incorporate deterrent clauses in the works contract so as to monitor the transportation and disposal of solid wastes, including but not limited to 1) restrict the routes of dump-trucks to and from the works sites and disposal facilities; 2) avoid dumping of any wastes and debris generated from the project in places other than destined facilities; 3) set up barging point to mandatorily collect and dispose of the waste generated by the proposed project; 4) prohibit the loaded dump trucks from accessing South Lantau Road and other vehicular accesses in Mui Wo and on Lantau which are deviated from the designated transportation routes; and 5) install GPS device on the dump trucks to track the transportation of wastes.
7. Site offices, carparks and other facilities associated with the construction of proposed project should not be located in farmlands and ecologically sensitive areas in construction phase.

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

Yours faithfully,



LO Wing-fung
Assistant Senior Education & Conservation Officer
Green Power

Reference:

¹ Environmental Protection Department (2018) River Water Quality in Hong Kong in 2018.

Available from:

<https://www.epd.gov.hk/epd/sites/default/files/epd/english/environmentinhk/water/hkwqrc/files/waterquality/annual-report/riverreport2018.pdf>