



**BY EMAIL ONLY**

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**Director of Environmental Protection**  
EIA Ordinance Register Office  
Environmental Protection Department  
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Dear Ms. Tse,

**Project Profile for Development of Integrated Waste Management Facilities Phase 2**

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

1. Green Power opines that incineration, the core technology for the proposed Project, should be the last resort for disposal of municipal solid wastes. In view of enacting municipal waste charging and developing recycling capacity in the territory, misuse of incineration will ruin the ultimate functions and goals of the charging scheme to reduce wastes at source and strangle recycling if incineration, which is able to reduce over 90% volume of waste, is considered as a routine mean of waste treatment.
2. Therefore, the Administration must promulgate a clear and firm positioning of Integrated Waste Management Facilities in their territory-wide waste reduction strategy<sup>1</sup> to avoid abusive use of incineration and reduce the need of more similar facilities.
3. Tuen Mun is highly prone to air pollution which ranked the top most polluting districts in terms of the number of hours with AQHI  $\geq 7$  and days with daily maximum AQHI  $\geq 7$  according to the Environmental Protection Department's yearly average Air Quality and Health Index (AQHI) data for past eight years<sup>2</sup>. The air pollutant sources of the proposed Project at the operation phase including the air emissions (such as nitrogen oxides) from the incinerator stacks and the odour nuisance from the waste reception halls will unavoidably worsen the air quality of neighbouring community and the district.
4. In particular, emissions of toxic air pollutants such as dioxins, polycyclic aromatic hydrocarbons (PAHs), hydrogen chloride, mercury vapour, etc., are anticipated. A cumulative air quality impact assessment, taking consideration of all existing and planned projects in the district as well as the regional emissions within the Pearl River Delta, should be undertaken in the EIA process.

5. The concentration of toxic or carcinogenic substances at the Project site should be closely monitored at the operation phase. A contingency plan should be deployed in response to any accidental events that threaten human health.
6. The waters around the Black Point next to the Project site have been identified as the “*key marine mammal habitat*” where the “*dolphin usage has climbed back to a slightly higher level*” in recent years<sup>3</sup>. The Chinese White Dolphin should be an ecological sensitive receiver directly influenced by the reclamation work and increase of marine traffic induced by the proposed Project. Hence, a cumulative impact assessment on marine mammals should be conducted.
7. The Project proponent should consider non-dredged reclamation method as far as practicable to minimize the adverse impacts on the water quality.
8. The Project site is located within the Deep Bay Water Control Zone. Therefore the Zero Discharge Policy should be strictly observed for discharge of wastewater during both the construction and operation phase.
9. The impacts of thermal pollution and antifouling agents on marine water and ecology from the cooling system of the proposed Project, if installed, should be assessed, especially on the oyster farms in Deep Bay. Cumulative pollution impacts of all operating and planned facilities in these aspects should be conducted.
10. The solid wastes generated from the proposed Project, including the construction and demolition (C&D) materials, chemical wastes, incinerator bottom ash, fly ash, etc., should be properly stored, transported, and finally disposed of at the designated facilities in accordance with the regulations.
11. Since the major sources of waste will be transported to the proposed Waste Management Facilities via marine access during the operation phase, any dumping at sea should be strictly forbidden during the transportation of waste with effective and prompt surveillance measures. EPD has been operating such system for control on marine dumping in Hong Kong water. Dumping vessels has to be installed with an automatic recording equipment, namely the Front End Mobile Unit (FEMU), which is a key component of the Real Time Tracking & Monitoring of Vessel (RTTMV) System of EPD. The FEMU transmits self-monitoring data direct from the barge at sea to the Control Centre at EPD through GPRS mobile communication network<sup>4</sup>.
12. In order to demonstrate the superiority of waste-to-energy technology to landfilling in combating climate change, the CO<sub>2</sub>-equivalence of unit weight (both with typical water content and without water content) should be calculated for common ingredients of combustible municipal solid waste.

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](mailto:wflo@greenpower.org.hk)).

Yours faithfully,



LO Wing-fung  
Senior Education & Conservation Officer  
Green Power

**References:**

<sup>1</sup> Environmental Protection Department. Annual Review - Waste Reduction Framework Plan. Available from:

[https://www.epd.gov.hk/epd/english/environmentinhk/waste/prob\\_solutions/waste\\_aview\\_av0100.html](https://www.epd.gov.hk/epd/english/environmentinhk/waste/prob_solutions/waste_aview_av0100.html)

<sup>2</sup> Green Power (2020). *A Brief Review of AQHI Data of Hong Kong for 2019*. Available from:

[https://www.greenpower.org.hk/html5/download/concern/20200327\\_e.pdf](https://www.greenpower.org.hk/html5/download/concern/20200327_e.pdf)

<sup>3</sup> Agriculture, Fisheries and Conservation Department (2020). *Monitoring of Marine Mammals in Hong Kong Waters (2019-20) —Final report*. Available from:

[https://www.afcd.gov.hk/english/conservation/con\\_mar/con\\_mar\\_chi/con\\_mar\\_chi\\_chi/files/Final\\_Report\\_2019\\_20.pdf](https://www.afcd.gov.hk/english/conservation/con_mar/con_mar_chi/con_mar_chi_chi/files/Final_Report_2019_20.pdf)

<sup>4</sup> Environmental Protection Department. *Control on marine dumping*. Available from:

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