



BY EMAIL ONLY

Ms. TSE Siu Wa, Janice, JP
Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
(E-mail: eiaocomment@epd.gov.hk)

5 May 2022

Dear Ms. Tse,

EIA Report for Yuen Long South Effluent Polishing Plant

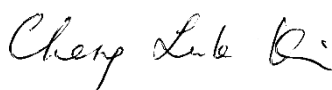
Green Power would like to draw your kind attention to our concerns on the Environmental Impact Assessment (EIA) Report for Yuen Long South Effluent Polishing Plant (the Project).

1. The effluent discharged from Yuen Long South Effluent Polishing Plant (YLSEPP) should fulfill the zero-discharge requirement of Deep Bay Area for water quality control. YLSEPP should also be capable of collecting and treating polluted stormwater and surface runoff from polluting landuses in its catchment area to facilitate the revitalization of Yuen Long Nullah.
2. During both construction and operation phase, the Project should neither pollute the river water, nor damage/disturb natural stream sections and create permanent obstacles to migration of aquatic species.
3. The works area and boundary of the Project should be clearly delineated. The construction of YLSEPP should avoid occupying the footprint of adjacent reedbed and disturbing reedbed's original soil (if any) so as not to affect the establishment of reedbed in coming phase by soil contamination.
4. Approximately 268,100 m³ of inert materials and 20,900 m³ of non-inert materials would be generated during the construction phase of the Project. Only 52,900 m³ of inert material would be reused on site while the remaining 215,200 m³ of surplus C&D inert material would be recycled or transported to Public Fill Reception Facilities. Despite claims of trip-ticket system being effective in avoiding illegal dumping and landfilling of C&D materials at unauthorized sites, cheating of the system is possible. Stringent documentation, verification and monitoring for the waste disposal system must be implemented to avoid landfilling in rural areas by waste generated by the Project, especially Shap Pat Heung and other rural areas in Yuen Long.

5. Effective and deterring measures to confine the travelling routes of dump trucks and similar machineries related to the Project should be utilized, e.g. real-time GPS devices on the trucks, instantaneous alarm alert for the trucks deviated from the designated routes, should be seriously considered. Implementation of such measures and associated penalties shall be included in the contract terms to effectively control the irregular activities of relevant contractors.
6. In view of a case of illegal dumping site for sludge trucks to unload untreated sewage and sludge in Tai Lam Country Park near Tai Tong Lychee Garden¹, the delivery of sludge cake generated from YLSEPP treatment of sewage sludge and organic waste must be strictly monitored. Measures proposed in paragraph 4 and 5 mentioned above should be seriously considered.
7. Transportation route of trucks loading with sludge and pre-treated food waste (for anaerobic digestion in YLSEPP) should strictly follow a designated route and be well air-tight and leachate-tight contained in delivery trucks to avoid odour nuisance to the public and residence along the transportation route.
8. Owing to the proximity of the YLSEPP to Tai Lam Country Park, landscape and visual impacts of the Project in operation phase should be mitigated by compatible architectural design, building height restriction, greening and plantation of suitable tree species (preferably native species).
9. Tree felling and transplantation should be avoided as far as possible. Preserved trees in the construction site should be well protected during construction phase by proper fencing against interference and damages, such as tramping by human or machines, wastewater or chemical discard or unnecessary trimming and root excavation.

Thank you very much for your kind attention.

Yours faithfully,



CHENG Luk-ki
Director

¹ 元朗大欖郊野公園揭大糞坑 3部吸糞車到場未完成清理 - 東網 2021年06月11日:
https://hk.on.cc/hk/bkn/cnt/news/20210611/bkn-20210611203514908-0611_00822_001.html