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Environmental Protection Department  
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香港觀鳥會  
THE  
HONG  
KONG  
BIRD  
WATCHING  
SOCIETY

Since 1957 成立

18 June 2014

Dear Director,

**Comments on Tai Shue Wan Development at Ocean Park – Environmental Impact  
Assessment Report**

The Hong Kong Bird Watching Society (HKBWS) would like to raise our concerns on the captioned project.



國際鳥盟成員

**Mitigation measures for potential breeding ardeids during construction phase**

As proposed in the EIA report during the construction phase, *“the remaining construction period, the Site should be monitored monthly in the breeding season (April to July) to check for any potential breeding activities such as evidence of nest building or nest sitting. If active ardeid nest is observed, suitably sized buffer area should be established to avoid human or machinery disturbance until the nest is abandoned”*<sup>1</sup>. It is unclear what would be considered as a “suitable sized buffer area” and its size would be subject to the types of works that are taking place and the judgment of the ecologist. For noisy construction works like percussive piling, providing a buffer area would not reduce the impacts to the breeding ardeids as the intensity of noise and vibrations from piling works would travel at distances beyond which a buffer area could mitigate. For a more effective approach to minimize disturbances from construction, aside from providing a buffer and erecting hoarding around the egretty so that contractors would not encroach, noisy works (i.e. piling) should not be allowed during the breeding season. Noisy construction works of the Project should be identified and the suspension of these works during the breeding season in the case that there are breeding ardeids should be included as a requirement of the Environmental Permit (EP).

Monitoring serves as a method to detect impacts only and not a solution for impact mitigation. Should impacts be detected based on the monitoring results even after the implementation of the measure proposed above, response actions (i.e.

<sup>1</sup> Section 10.7.1.3 of the EIA report, potential impact on breeding ardeids.

suspension of noisy works, etc.) should be identified and carried out. The EIA report has failed to mention the implementation of response actions which is the key for mitigation of impacts.

#### Ardeids night roost during construction phase

Monitoring of the existing night roost is proposed in the EIA report, "the existing ardeid night roost location should be monitored monthly during peak wintering season (November to March) within construction phase by a qualified ecologist to check its status"<sup>2</sup>. Monitoring of the roost serves as a method to detect impacts only and is not a solution for impact mitigation. Therefore, response measures to minimize impacts must be added to the EIA report in order to complete the section on mitigation.

#### Maximizing the effective of the new Flamingo Pond

The new Flamingo Pond proposed in S 10.7.3.1 of the EIA report is considered as compensation for the loss of the existing ardeid roost. To maximize the effectiveness of the new Flamingo Pond as an alternate roosting site, the new pond should be phased to be completed early in the construction prior to any works, including vegetation clearance, taking place at the existing night roost. This provides an alternative location for a night roost nearby and minimize the displacement impact arising from the construction and loss of existing Flamingo Pond.

The HKBWS respectfully requests the Environmental Protection Department to consider our comment above.

Yours faithfully,



Jocelyn Ho  
Senior Conservation Officer  
The Hong Kong Bird Watching Society

cc:

AFCD

Conservancy Association

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<sup>2</sup> Section 10.7.2.1 of the EIA report, impact on ardeid roosting population.

Designing Hong Kong  
Kadoorie Farm and Botanic Garden  
WWF – Hong Kong