

Ms. Bernadette Linn, JP  
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(E-mail: DLOffice@landsd.gov.hk)



香港觀鳥會  
THE  
HONG  
KONG  
BIRD  
WATCHING  
SOCIETY  
Since 1957 成立

By email only

8 July 2015

Dear Ms. Linn,

**Objection to the Expansion of Hong Kong International Airport into a Three-runway System (G.G. 3319)**

The Hong Kong Bird Watching Society (HKBWS) would like to raise an objection on the Expansion of Hong Kong International Airport (HKIA) into a Three-Runway System (3RS). Our reasons are stated below:

**1. The decision of Director on Environmental Protection (DEP) to approve the 3RS is under Judicial Review**

In May 2015, the High Court accepted an application for judicial review against the decision of the DEP to approve the expansion of HKIA into a 3RS. The HKBWS considers that all preparation works for the implementation of the 3RS (e.g., achieving the approval from the Lands Department for land formation works at the foreshore and sea-bed next to HKIA, and the amendment of the Chek Lap Kok Outline Zoning Plan) should **NOT** commence until the High Court has made a final decision on the case.

**2. Concerns on construction works adjacent to Sha Chau egretty**

Sha Chau Egretty is the second largest egretty in Hong Kong in 2013. Eighty-three nests were recorded at Sha Chau Egretty last year, making up 10.9% of the total number of nests in Hong Kong. This colony is comprised of Black-crowned Night Heron (*Nycticorax nycticorax*), Little Egret (*Egretta garzetta*) and Great Egret (*Ardea modesta*)<sup>1</sup>. As mentioned in the Environmental Impact Assessment of the 3RS project, diversion of submarine pipelines is required for the ground improvement works for the third runway land formation. The area next to the egretty has been proposed as the daylighting location of the Horizontal Directional Drilling (HDD) for

<sup>1</sup> Egretty Counts in Hong Kong, with particular reference to The Mai Po Inner Deep Bay Ramsar Site – Summer 2013 Report



the diversion of pipelines (Figure 1). Breeding egrets are susceptible to disturbance by human activity, which may lead to abandonment of their breeding areas or nestlings. Yet, the EIA report has failed avoid this sensitive location and failed to address the need for ecological monitoring from pre-construction to post-construction. Therefore, the captioned project should not be supported.

### **3. Loss of marine habitats from 3RS reclamation and concurrent projects**

The tentative schedule for the construction of the 3RS from 2015 to 2023 overlaps with the construction phase of the Hong Kong-Zhuhai-Macao Bridge Boundary Crossing Facility (HKZMB BCF), Hong Kong Link Road (HKLR) and Tuen Mun-Chek Lap Kok Link (TMCLKL), which would continue until 2016 (Figures 2 – 4, Table 1). There is also the possibility of overlapping construction period with the Sunny Bay development which consists of approximately 80 ha of reclamation works, and the reclamation for land supply at Lung Kwu Tan which is approximately of 200 – 300 hectares in area. Based on the information extracted from the EIAs of these projects, for the first four years (2015-2018) of 3RS's construction, there will be concurrent reclamation projects taking place (Table 1). **For the duration of four years (2015-2018), the marine habitat loss at north Lantau waters (including temporary and permanent) from these projects amounts to 1,991.3 ha<sup>2</sup>.** This is a significant amount of habitat loss for Chinese White Dolphins (CWD), which is globally “Near Threatened” with a declining population and is found in the North Lantau Waters of Hong Kong. It is likely that CWDs will completely avoid the North Lantau Waters. **The total permanent loss of marine habitats from all four projects amounts to 854.7 ha, and the 3RS alone is responsible for 76%<sup>3</sup> of this total area.**

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<sup>2</sup> 1,600 ha from 3RS; 140.3 ha from TMCLKL; 64 ha from HKLR; and 364 ha from HKZMB BCF.

<sup>3</sup> 650 ha from 3RS / 854.7 total ha

**Table 1.** The loss of marine habitats for different projects in the North Lantau Waters

Project	Temporary loss of marine habitat (ha)	Permanent loss of marine habitat (ha)	Total*	Construction Phase								
				2011	2012	2013	2014	2015	2016	2017	2018	2018-23
3RS	981	650	1631					x	x	x	x	X
TMCLKL	92.6	47.7	140.3	x	x	x	x	x	X	x	X	
HKLR	37	27	64		x	x	x	x	X			
HKZMB BCF	26	130	156	x	x	x	x	X	x			
Sunny Bay Reclamation	Not available	80	>80							?	?	?
Lung Kwu Tan Reclamation	Not available	200-300	>200							?	?	?

\*Total = temporary loss + permanent loss

#### 4. Ineffective compensatory mitigation measure

In order to mitigate the temporary and permanent loss of 1,631 ha marine habitat, the project proponent proposed to establish a 2,400 ha Marine Park (MP) in the surrounding waters of the airport new extension. However, the MP will be designated after the completion of the 3RS project in 2023. During the 8 – 9 years of construction period for the 3RS project, the continuously declining population of the globally “Near Threatened” Chinese White Dolphin (CWD) is expected to be adversely affected by the 3RS project and other concurrent projects leading to a further decline. It is uncertain if the CWD would return and inhabit the protected habitats within the new MP. We consider that this so-called mitigation measure is in fact a “destroy first, conserve later” approach, where the conservation promises made from the early stages of the development proposal are still not solidified but destruction has already been taken place. Therefore, the proposed new MP cannot effectively mitigate the ecological impacts caused by the 3RS project and thus the work should not proceed.

#### 5. Justifications for the decision made by Lands Department (LandsD)

As said in the previous section, the decision of DEP to approve the 3RS project is under judicial review. If the LandsD decided to approve the captioned project, and if such approval is against the judgement of the High Court in the future, we urge that detailed and comprehensive justifications from LandsD should be provided.

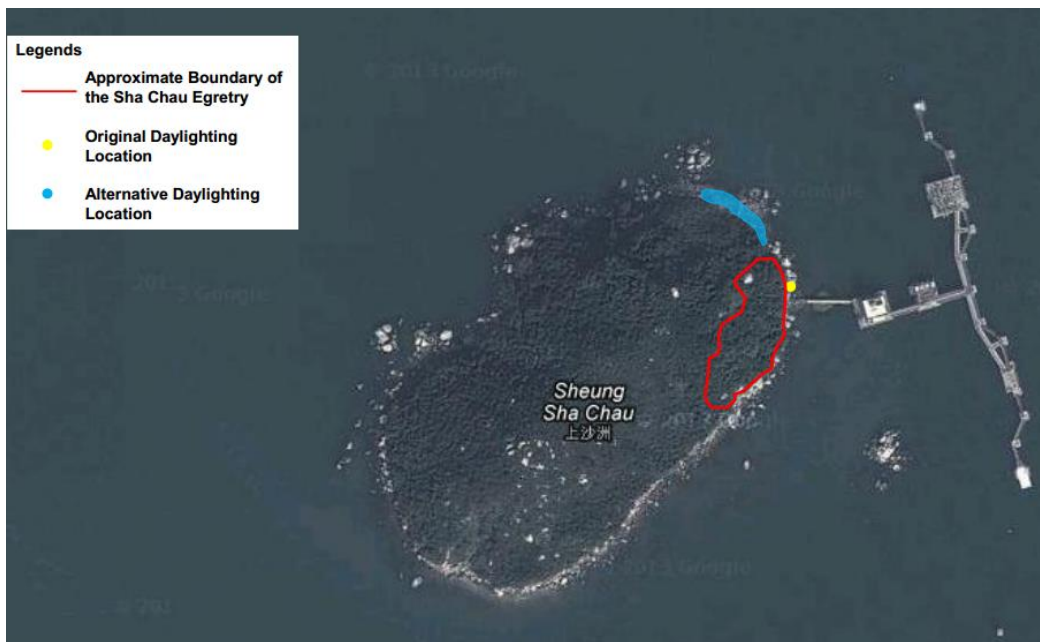
Given that the 3RS project would lead to a significant loss of marine habitats, threatened the globally endangered CWD, and the fact that the mitigation measures proposed are ineffective and the DEP's decision is under judicial review, the HKBWS considers that the proposed ground improvement and filling of sea-bed for the 3RS project should not proceed, and therefore, we respectfully request the Lands Department to **reject** this project.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Woo Ming Chuan', written in a cursive style.

Woo Ming Chuan  
Conservation Officer  
Hong Kong Bird Watching Society

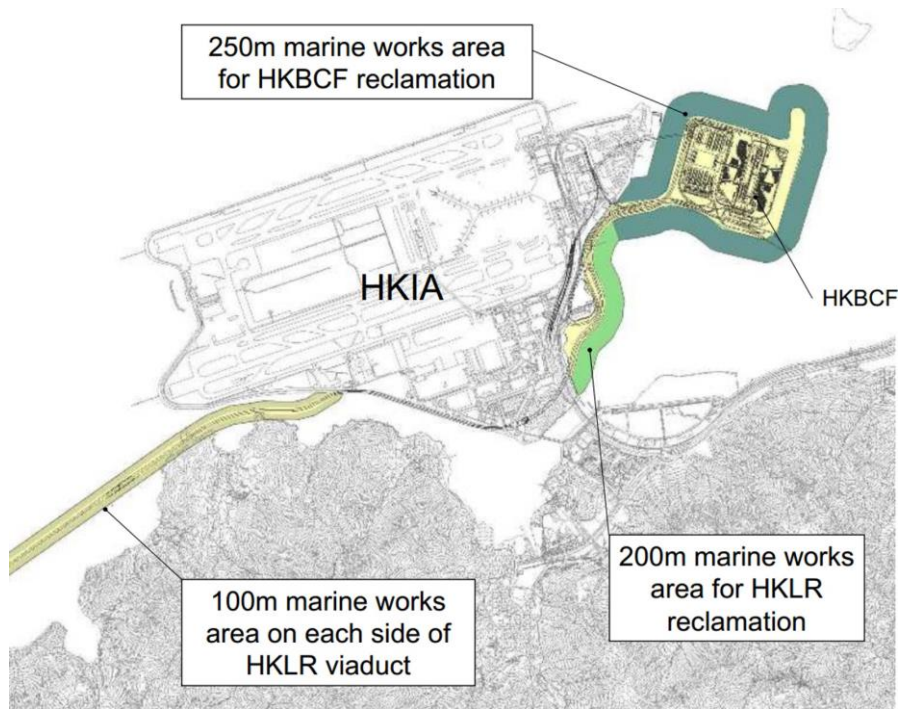
**Figure 1.** Approximate location of the daylighting locations



**Figure 2.** Habitat loss from the 3RS reclamation



**Figure 3. Habitat loss from HKZMB BCF reclamation**



**Figure 4. Habitat loss from TMCLKL**

